

From: [Leshak, Andrea](#)
To: [Region2 SFRecordCtr](#)
Subject: FW: International Paper Response to 104e Request for Information on PROTECTO superfund site
Date: Wednesday, May 26, 2021 4:37:40 PM
Attachments: [ATT00001.txt](#)
[Master Record Retention Policies - 2017 superseded - Final.pdf](#)
[Master Record Retention Policies - 2018 - Final.pdf](#)
[Master Records Retention Schedule - 2012 - Final - RMG - January 2012.pdf](#)
[Master Records Retention Schedule - 2012 - Final - RMG - January 2012.pdf](#)
[International Paper Response.pdf](#)
[International Paper Response Attachment One.pdf](#)
[International Paper Response Attachment Two.pdf](#)
[International Paper Response Attachment One Legalsize docs.pdf](#)

Please upload the attached 104e response and attachments to SEMS for the PROTECTO Site. Many thanks!

From: Brian E Heim <Brian.Heim@ipaper.com>
Sent: Wednesday, May 26, 2021 3:26 PM
To: Leshak, Andrea <leshak.andrea@epa.gov>; Luna, Zolymar <Luna.Zolymar@epa.gov>
Subject: International Paper Response to 104e Request for Information on PROTECTO superfund site

Dear Ms. Leshak and Ms. Luna,

Please find attached International Paper Company's response to US EPA's Request for Information regarding the PROTECTO superfund site. The attachments are provided in separate PDF files. Three documents are legal sized so I scanned those separately. Also please find attached "zipped" files that contain documents responsive to the request regarding document retention.

Please continue to direct all communications regarding this matter to me. Thank you and please contact me with any questions regarding our response.

Best regards,

Brian E. Heim
General Counsel
Intellectual Property &
EHS
International Paper
6400 Poplar Avenue
Memphis, TN 38197
O (901) 419-3824
C (901) 229-0724
F (901) 214-1235
brian.heim@ipaper.com

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**RESPONSE OF INTERNATIONAL PAPER COMPANY
TO U.S. EPA'S INFORMATION REQUEST REGARDING THE
PROTECTO SUPERFUND SITE**

General Objections

International Paper Company ("International Paper") objects to the information request to the extent the request seeks information protected by the attorney-client privilege.

International Paper responds to the information request based on its current knowledge and reserves the right to supplement this response if responsive information is discovered in the future.

International Paper objects to the information request to the extent that it is unduly burdensome, unreasonably broad and seeks information that is not reasonably relevant to the EPA's basic inquiry.

1. Please answer the following questions regarding the Company:

- a. State the correct legal name and mailing address for the Company;
- b. State the name(s) and address(es) of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of the Company; and
- c. Identify the state/commonwealth and date of incorporation of the Company and the name of its agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different.

RESPONSE

International Paper Company
6400 Poplar Avenue
Memphis, TN 38197

Mark Sutton is the CEO and Chairman of the Board.

International Paper Company is a New York corporation, incorporated in 1941.

For purpose of this matter, Brian E. Heim, is International Paper's designated agent for service of process.

Brian E. Heim
General Counsel
Intellectual Property & EHS
International Paper
6400 Poplar Avenue
Memphis, TN 38197
O (901) 419-3824
C (901) 229-0724
brian.heim@ipaper.com

2. State the corporate history of Puerto Rico Container Company, Inc. and/or Puerto Rico Container Company, Ltd., including all name changes and mergers. List all names under which Puerto Rico Container Company, Inc. and/or Puerto Rico Container Company, Ltd. have operated and have been incorporated. For each other name identified, provide the following information:
 - a. Whether that other company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;
 - b. Names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
 - c. Names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations, if any, of that other company.

RESPONSE

Puerto Rico Container Company, Limited (PRCC) was formed on or about December 6, 1960 and since February 22, 1971 was owned and controlled by International Paper. PRCC ceased operations in or about 1981 and its assets, including real estate were sold in 1982. The corporate form of the subsidiary continued to exist until it was liquidated in or about 1989. PRCC made corrugated boxes.

A second International Paper subsidiary, a Delaware corporation formed in 1977, operated at the same facility owned by PRCC. It was called International Paper Puerto Rico, Inc. (IPPR). In 1977 IPPR purchased corrugating equipment from PRCC and continued to operate those assets in the PRCC facility. IPPR sold corrugated paper to PRCC to make boxes. IPPR ceased operations in or about 1981 and its assets were sold in 1982. The corporate form of the subsidiary continued to exist until it was liquidated in or about 1989.

Puerto Rico Container Company, Inc. was incorporated in Delaware on August 12, 1992 by International Paper. The company was dissolved in 2005. It had no connection to the Facility or the Site.

3. Identify all changes in ownership relating to Puerto Rico Container Company, Inc. and/or Puerto Rico Container Company, Ltd. from their dates of incorporation to the present, including the date of any ownership change. If any owner was/is a corporation, identify if the corporation was a subsidiary or division of another corporation. In your identification of any corporation, it is requested that you provide the full corporate name, the state/commonwealth of incorporation, and all fictitious names used/held by that corporation.

Response

See response to Question 2.

4. For each owner that is a subsidiary of another corporation identified in your answer to Request #3, above, please provide a chart that details the corporate structure from that other company through all intermediary entities to the ultimate corporate parent. For purposes of this information request, the term "ultimate corporate parent" means the corporate entity that, while owning or controlling the majority of the shares of common stock in a subsidiary corporation, is not primarily owned/controlled by another corporation.

RESPONSE

See response to Question 2. International Paper was the ultimate parent of the PRCC and IPPR. International Paper was the parent company and sole owner of PRCC and IPPR and holds all liabilities, if any, of both PRCC and IPPR.

International Paper was the ultimate parent of the Puerto Rico Container Company Inc.. That company has no connection to the Site or the Facility.

5. Provide copies of Puerto Rico Container Company, Inc. and/or Puerto Rico Container Company, Ltd.'s authority to do business in Puerto Rico. Include all authorizations, withdrawals, suspensions, and reinstatements.

RESPONSE

Responsive documents are attached in exhibit "Corporate Documents." Because Puerto Rico Container Company, Inc. has no connection to the Site or Facility, corporate documents regarding that entity have not been produced.

6. State the dates during which Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company owned, operated, or leased any portion of the Facility, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including but not limited to purchase and sale agreements, deeds, leases, etc.

RESPONSE

See response to Question 2. PRCC owned the facility from 1961 to 1982. Documents responsive to this request are in exhibit "Real Estate."

7. Describe the current and past business relationship between the Company and Puerto Rico Container Company, Inc.

RESPONSE

See response to Question 2. International Paper formed Puerto Rico Container Company, Inc. in 1992. That company was dissolved in 2005. The company had no connection to PRCC or IPPR which had been fully liquidated five years earlier. No liabilities were transferred from PRCC or IPPR to the Puerto Rico Container Company, Inc.

8. Describe the current and past business relationship between the Company and Puerto Rico Container Company, Ltd.

RESPONSE

See response to Question 2. International Paper was the ultimate corporate parent of PRCC.

9. Describe any asset purchase agreements whereby some or all of the assets of Puerto Rico Container Company, Inc. and/or Puerto Rico Container Company, Ltd. were sold to any other entity, including the date(s), the companies involved, and the terms of such asset purchase agreement(s).

RESPONSE

In 1977, corrugating assets of PRCC were sold to IPPR, a related subsidiary of International Paper. In September 1981 both PRCC and IPPR sold their respective operating equipment to ABC Container Corporation. A copy of that sales agreement has not been located. A memo summarizing that transaction is included in exhibit "Corporate Documents."

In 1982 the Facility real estate was sold by PRCC to Puerto Rico Box Company, Inc. A copy of the deed is included in exhibit "Real Estate." International Paper has no corporate connection to or information concerning Puerto Rico Box Company, Inc.

10. Indicate whether the Company is the successor to any liabilities, including those under CERCLA, of Puerto Rico Container Company, Inc.

RESPONSE

International Paper is a successor to the liabilities of Puerto Rico Container Company, Inc., including any liability under CERCLA. However, International Paper denies that its predecessor company Puerto Rico Container Company, Inc. had any connection to or liability related to the Site.

11. Indicate whether the Company is the successor to any liabilities, including those under CERCLA, of Puerto Rico Container Company, Ltd.

RESPONSE

International Paper is the successor to the liabilities of Puerto Rico Container Company, and IPPR, including any under CERCLA.

12. Identify all meetings and communications that the officers, directors, or employees of the Company participated in or attended regarding the operations of the Facility.

RESPONSE

Responsive information that pertains to the exchange of assets in 1977, the sale of operating assets in 1981, and the dissolution of both IPPR and PRCC are attached in exhibit "Corporate Documents." No documentation regarding the day-to-day operations of the Facility was located.

13. Identify what, if any, reports, statements, or other documents the officers or directors of the Company wrote or received regarding the operations of the Facility and describe what, if any, information the officers and directors received concerning the operations of the Facility.

RESPONSE

See Response to Question 12.

14. Identify any employees, officers, or directors of the Company who participated in discussions or other communications regarding any decision pertaining to disposal of waste materials from the Facility.

RESPONSE

No responsive information has been located.

15. State whether any officers or directors of the Company approved, authorized, discussed, or had knowledge or awareness of any arrangement to dispose of wastes from the Facility. Describe the nature and extent of such approval, authorization, discussion, knowledge, or awareness.

RESPONSE

No responsive information has been located.

16. Indicate whether any reports discussing waste disposal practices at the Facility were ever received by officers or directors of the Company. If your answer to this Request is in the affirmative, indicate (i) when such reports were received, (ii) who the originator of such reports was, (iii) who such reports were directed to, and (iv) the content of such reports. If such reports are in your possession or control, submit copies of such reports to EPA.

RESPONSE

No responsive information has been located.

17. Describe the circumstances surrounding the liquidation of Puerto Rico Container Company, Ltd., including in your answer the following:
- a. The exact date of liquidation;
 - b. The names and addresses of any and all shareholders at the time of liquidation;
 - c. The value of all assets distributed to each shareholder as a result of the liquidation;
 - d. The final disposition or distribution of all assets, liabilities, and shares of Puerto Rico Container Company, Ltd.;
 - e. The identity of all parties to any transactions relating to or arising out of the liquidation; and
 - f. The identity of all documents relating to the liquidation.

RESPONSE

See prior responses.

18. Identify any successor entities to which assets and liabilities of the liquidated Puerto Rico Container Company, Ltd. were transferred.

RESPONSE

Approximately \$1.8 million in PRCC financial assets was disbursed to International Paper upon final liquidation of PRCC in 1989. Relevant documentation is enclosed in exhibit "Corporate Documents."

19. Please provide all notices concerning the liquidation of Puerto Rico Container Company, Ltd. to persons with claims against Puerto Rico Container Company, Ltd., or such notices published in newspapers of general or national circulation.

RESPONSE

See response to Question 18. No other responsive information has been located.

20. Please provide all petitions and other court filings concerning the amount and form of security reasonably likely to provide compensation for any claim against Puerto Rico Container Company, Ltd.

RESPONSE

No responsive information has been located.

21. Please provide all documents concerning any plan of distribution pursuant to which Puerto Rico Container Company, Ltd. paid or made provisions to pay claims and obligations.

RESPONSE

No responsive information has been located.

22. Identify what, if any, reports, statements, or other documents the officers or directors of the Company wrote or received regarding the liquidation of Puerto Rico Container Company, Ltd. and describe what, if any, information the officers and directors received concerning the liquidation. Please provide copies of such reports, statements, or other documents.

RESPONSE

See response to Question 18.

23. Identify any employees, officers, or directors of the Company who participated in discussions or other communications regarding the decision to liquidate Puerto Rico Container Company, Ltd.

RESPONSE

Aside from individuals referenced or copied on the attached documents, no responsive information has been located.

24. State whether any officers or directors of the Company approved, authorized, discussed, or had knowledge or awareness of the decision to liquidate Puerto Rico Container Company, Ltd. Describe the nature and extent of such approval, authorization, discussion, knowledge, or awareness.

RESPONSE

One or more officers of International Paper were involved in the decision to liquidate the PRCC. The attached documents speak for themselves.

25. Describe how Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company came to possess the hazardous substances that came to be located at the Site.

RESPONSE

PRCC produced corrugated containers. That process used brown corrugated containerboard, starch (adhesive) and various pieces of folding, cutting and printing equipment. No operational documents or schematics were located. However, we located and are producing an excerpt from a 1977 general ledger report that attached was to a tax document, that includes a line item entry for the purchasing of flexo ink and regular ink. Historically, in the 1970s, inks contained lead or other metals in various concentrations.

26. List all hazardous substances used, generated, treated, stored, disposed of, manufactured, recycled, recovered, treated, or otherwise processed during Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company's operations at the Facility.

RESPONSE

See response to question 26. We have located no responsive records other than what has been provided by US EPA.

27. List and fully describe all waste streams generated from Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company's operations, including solid, liquid, or any other type of waste.

RESPONSE

See response to question 26.

28. Describe in detail the handling, storage, and disposal practices employed for each waste stream resulting from Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company's operations.

RESPONSE

See response to question 26, We have located no records that document the handling, storage or disposal practice at the IP Subsidiary facility.

29. Identify all individuals who had responsibility for Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company's environmental and waste management decisions between 1975 and 1999 (e.g., responsibility for decisions regarding the disposal, treatment, storage, recycling, or sale of hazardous substances, hazardous wastes, and industrial wastes), including the following:
- a. Each such individual's job title, duties, dates performing those duties, supervisors for those duties, current position, and if applicable, the date of the individual's resignation or termination; and
 - b. The nature of the information possessed by each such individual concerning Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company's waste management.

RESPONSE

We have located no information responsive to this request.

30. For each type of hazardous substance, hazardous waste, and industrial waste used or generated by Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company, describe the agreements or other arrangements for its disposal, treatment, storage, recycling, or sale, and provide the following:
- a. Any agreement and document, including waste logs, journals, manifests, or notes, related to any transfer of hazardous substances, hazardous wastes, and industrial wastes from the Facility that came to be located at the Site;
 - b. All correspondence and written communications between Puerto Rico Container Company, Inc. and each owner/operator of the Site regarding hazardous substances, hazardous wastes, and industrial wastes from the Facility that came to be located at the Site;
 - c. All correspondence and written communications between Puerto Rico Container Company, Ltd. and each owner/operator of the Site regarding hazardous substances, hazardous wastes, and industrial wastes from the Facility that came to be located at the Site; and
 - d. All correspondence and written communications between the Company and each owner/operator of the Site regarding hazardous substances, hazardous wastes, and industrial wastes from the Facility that came to be located at the Site.

RESPONSE

Except for the information provided to us by US EPA, we have located no information responsive to this request.

31. Provide agreements and documents related to the following, including waste logs, journals, manifests, or notes, as set forth below:
- a. The locations where Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company sent each type of hazardous substance, hazardous waste, and industrial waste from the Facility for disposal, treatment, or recycling;
 - b. List all waste transporters used by Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company;
 - c. For each type of hazardous substance, hazardous waste, and industrial waste, specify which waste transporter picked it up;
 - d. For each type of hazardous substance, hazardous waste, and industrial waste, state how frequently each waste transporter picked up such waste;
 - e. For each type of hazardous substance, hazardous waste, and industrial waste, provide the volume picked up by each waste transporter (per week, month, or year);
 - f. For each type of hazardous substance, hazardous waste, and industrial waste, identify the dates (beginning & ending) such waste was picked up by each waste transporter;
 - g. Indicate the ultimate location for each type of hazardous substance, hazardous waste, and industrial waste. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of hazardous substance, hazardous waste, and industrial waste;
 - h. Describe how Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company managed pickups of each hazardous substance, hazardous waste, and industrial waste including but not limited to:
 - i. The method for inventorying each type of hazardous substance, hazardous waste, and industrial waste;
 - ii. The method for requesting each type of hazardous substance, hazardous waste, and industrial waste to be picked up;
 - iii. The identity of the waste transporter employee/agent contacted for pickup of each type of hazardous substance, hazardous waste, and industrial waste; and
 - iv. The amount paid or the rate paid for the pickup of each type of hazardous substance, hazardous waste, and industrial waste;
 - i. Identify the individual or entity that selected the location where each of Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company's wastes were taken. Describe the basis for and provide any documents supporting the answer to this Request.

RESPONSE

Except for the information provided to us by US EPA, we have located no information responsive to this request and subparts.

32. If not already provided, specify the dates and circumstances when Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company's hazardous substances, hazardous wastes, and/or industrial wastes were sent, brought, or moved to the Site, and identify the names, addresses, and telephone numbers of the person(s) making arrangements for the containers (e.g., 55-gallon drum, dumpster, etc.) holding hazardous substances, hazardous wastes, and/or industrial wastes to be sent,

brought, or transported to the Site. Please also provide all documents that support or memorialize the answer to this Request.

RESPONSE

Except for the information provided to us by US EPA, we have located no information responsive to this request and subparts.

33. Identify, describe, and provide all documents that refer or relate to the following:
- a. The nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all hazardous substances, hazardous wastes, and industrial wastes involved in each arrangement transferring materials from any facility owned or operated by Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company (including the Facility) to any other facility;
 - b. In general terms, the nature and quantity of the non-hazardous substances involved in each such arrangement for transporting materials;
 - c. The hazardous substances being mixed or combined with other hazardous substances or non-hazardous substances for each such arrangement. Indicate whether such mixing or combining is common in the industry. Indicate whether Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company was ever asked to stop mixing or combining the hazardous substances with the non-hazardous substances;
 - d. Other materials other than the hazardous substances that were involved in the transaction;
 - e. The condition of the transferred material containing hazardous substances when it was stored, disposed of, treated, or transported for disposal or treatment;
 - f. The markings on and type, condition, and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal or treatment; and
 - g. All tests, analyses, analytical results, and manifests concerning each hazardous substance, hazardous waste, and industrial waste involved in each transaction. Include information regarding who conducted the test and how the test was conducted (batch sampling, representative sampling, splits, composite, etc.).

RESPONSE

Except for the information provided to us by US EPA, we have located no information responsive to this request and subparts.

34. Indicate how long Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company has had a relationship with the owner(s) and/or operator(s) of the Site.

RESPONSE

Except for the information provided to us by US EPA and which is attached to this response, we have located no information responsive to this request and subparts. Based on the timing of the

shipment to the Site and the selling of the PRCC and IPPR assets and real property, it appears that the waste was a one-time shipment generated around the time of the sale of the Facility.

35. Identify any individuals, including former and current employees, who may be knowledgeable of Puerto Rico Container Company, Inc., Puerto Rico Container Company, Ltd., and/or the Company's operations and practices concerning the handling, storage, and disposal of hazardous substances.

RESPONSE

We have located no information responsive to this request.

36. Please provide all documents, if not already requested above, that support your responses to Requests #1 - #35, above.

RESPONSE

No relevant documents have been located beyond those referenced in the above responses.

37. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
- a. The relevant document retention policy between 1975 and the present;
 - b. A description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction;
 - c. A description of the type of information that would have been contained in the documents;
 - d. The name, job title, and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents, the person(s) who would have been responsible for the destruction of these documents, and the person(s) who had and/or still may have the originals or copies of these documents; and
 - e. The names and most current address of any person(s) who may possess documents relevant to these requests for information.

RESPONSE

See attached Record Retention schedules that are provided in zipped electronic files. We have no information regarding the manner in which documents may have been destroyed. All documents produced in this response were gathered from archived records. International Paper has catalogued historical documents and indexed a database of hundreds of thousands of boxes. Ossie Thomas, whose contact information is provided in response to question 41, assisted Brian Heim is searching for responsive records and also provided the copies of the available records retention schedules.

38. List and provide a copy of all agreements or contracts, including but not limited to insurance policies and indemnification agreements, held or entered into by the Company or its subsidiaries that could indemnify it against any liability that it may have under CERCLA for releases or threatened releases of hazardous substances at the Site as a result of any arrangement for disposal from the Facility. In response to this Request, please provide not only those insurance policies and agreements that currently are in effect, but also provide those that were in effect during the period(s) when any hazardous substances, hazardous wastes, and/or industrial wastes may have been disposed of at the Site.

RESPONSE

No policies that might provide insurance in this matter have been identified.

39. State whether any claim or claims have been made by the Company to any insurance company for any loss or damage related to operation at the Site, and if so, identify each claim by stating the name of the claimant, the name and address of the insurance company, the policy number, the named insured on the policy, the claim number, the date of claim, the amount of claim, the specific loss or damage claimed, the current status of the claim, and the amount, date, and the recipient of any payment made on the claim.

RESPONSE

No such claim has been or will be made.

40. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

RESPONSE

No such individual has been identified.

41. State the name, title, and address of each individual who assisted or was consulted in the preparation of the response to this Request for Information. In addition, state whether each such person has personal knowledge of the information in the answers provided.

RESPONSE

Brian Heim (contact information provided in response to Question 1), prepared these responses. Mr. Heim has no personal knowledge of the information presented except for his general knowledge of container plant operations gained in his experience as a paper industry environmental attorney for almost 20 years.

Ossie Thomas, International Paper Records Manager, 6400 Poplar Avenue, Memphis, TN 38197, assisted Mr. Heim is researching company archives for responsive information. Ms. Thomas has no personal knowledge of the information in this Response.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State/Commonwealth of Tennessee

County/Municipality of Shelby

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

BRIAN E. HEIM

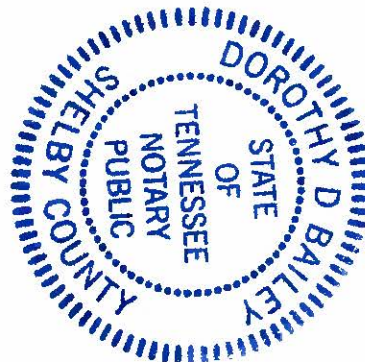
General Counsel, Intellectual Property & EHS

Brian E. Heim
SIGNATURE

Sworn to before me this 26th
day of May, 2021.

Notary Public

Dorothy D. Bailey
Dorothy D. Bailey



My Commission Expires March 13, 2022

Attachment One

Corporate Documents

ARTHUR ANDERSEN & Co.

SAN JUAN, PUERTO RICO

To the Board of Directors,

Puerto Rico Container Company Limited:

We have examined the balance sheet of PUERTO RICO CONTAINER COMPANY LIMITED (a Bahamian corporation and a wholly-owned subsidiary of International Paper Overseas Limited) as of December 31, 1964. Our examination was made in accordance with generally accepted auditing standards, and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

Except for the effect on the balance sheet of any adjustments arising from the final settlement of the purchase price referred to in Note 1, in our opinion, the accompanying balance sheet presents fairly the financial position of Puerto Rico Container Company Limited as of December 31, 1964, in conformity with generally accepted accounting principles applied on a basis consistent with that of the preceding year.

Arthur Andersen & Co.

San Juan, P. R.,
February 8, 1965.



PUERTO RICO CONTAINER COMPANY LIMITED

(A wholly-owned subsidiary of International Paper Overseas Limited)

BALANCE SHEET -- DECEMBER 31, 1964

ASSETS

CURRENT ASSETS:

Cash		\$ 41,119
Accounts receivable, less reserve for doubtful accounts of \$48,925		1,071,552
Inventories, at the lower of average cost or market-		
Finished goods		130,051
Goods in process		40,644
Raw materials		566,153
Prepaid expenses, etc.		61,447

		\$1,910,966

PLANT, PROPERTY AND EQUIPMENT:

At tentative cost (Note 1)	\$ 904,120	
At cost, including \$268,710 of land	1,883,081	

	\$ 2,787,201	
Less- Accumulated depreciation (Note 1)	<u>407,049</u>	2,380,152

GOODWILL, in process of amortization
to October, 1966

25,410

\$4,316,528
=====

LIABILITIES AND SHAREHOLDER'S EQUITY

CURRENT LIABILITIES:

Accounts payable-		
Trade		\$ 52,999
Affiliated companies		416,761
Accrued liabilities		63,506

		\$ 533,266

PAYABLE TO AFFILIATES:

International Paper Overseas Limited (Note 1)	\$ 1,353,125	
Other	<u>2,657,000</u>	4,010,125

SHAREHOLDER'S EQUITY:

Capital stock, par value \$1 (\$2.80) per share, authorized and outstanding 1,000 shares	\$ 2,800	
Capital surplus, representing excess of amounts paid in (cash and property) over par value of capital stock	805,800	
Deficit (Notes 1 and 2)	<u>(1,035,463)</u>	(226,863)

		\$4,316,528 =====

The accompanying notes to financial statements
are an integral part of this balance sheet.

PUERTO RICO CONTAINER COMPANY LIMITED

(A wholly-owned subsidiary of International Paper Overseas Limited)

NOTES TO FINANCIAL STATEMENTS

DECEMBER 31, 1964

- (1) The Company began operations as of January 1, 1961, as of which time it acquired the assets and assumed certain liabilities of certain corporate entities owned by W. R. Grace & Co. pursuant to an agreement dated December 29, 1960, between its parent International Paper Overseas Limited, and W. R. Grace & Co. The current assets received were recorded at amounts not exceeding estimated net realizable values and the liabilities assumed were recorded at the amounts as shown on the books of the selling companies. The balance of the purchase price was allocated to plant, property and equipment. Claims for adjustment were made by International Paper Overseas Limited because it was felt that certain inventories and other assets were overvalued and certain liabilities were understated in the calculation of the purchase price. Management expects that final adjustment of the accounts to reflect the settlement will be made during the year 1965. Any adjustment will increase or decrease the cost of plant, property and equipment and the amount due to International Paper Overseas Limited, and will result in adjustments to the provision for depreciation and deficit.
- (2) The Company has a net operating loss carry-forward of approximately \$500,000 which expires as follows:

1967	\$ 70,000
1968	430,000

	\$500,000
	=====

In addition, the Company has elected to use flexible depreciation for tax purposes. As of December 31, 1964, the recorded book accumulated depreciation is approximately \$395,000 in excess of the amount claimed for tax purposes. This amount is also available to reduce the Puerto Rico income taxes applicable to future years' earnings.

- (3) The accompanying balance sheet is submitted in compliance with the Laws of Puerto Rico, and accordingly does not constitute the complete financial statements of the Company, including the results of operations.

ARTHUR ANDERSEN & Co.
SAN JUAN, PUERTO RICO

To the Board of Directors of

Puerto Rico Container Company Limited:

We have examined the statement of net assets of PUERTO RICO CONTAINER COMPANY LIMITED (a Bahamas corporation in process of liquidation and a subsidiary of International Paper Company) as of December 31, 1982. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances, except as explained in the following paragraph.

As discussed in Note 1, the Company has provided a reserve to cover estimated losses from the liquidation of its assets and estimated close-down expenses. However, management presently cannot substantiate the balance of the reserve for discontinuance of operations as of December 31, 1982.

In our opinion, except for the effect of such adjustments, if any, as might have been disclosed had management substantiated the reserve mentioned in the preceding paragraph, the statement of net assets presents fairly the net assets of Puerto Rico Container Company Limited as of December 31, 1982.

Arthur Andersen & Co.

San Juan, Puerto Rico,
March 28, 1983.

392061



PUERTO RICO CONTAINER COMPANY LIMITED

STATEMENT OF NET ASSETS -- DECEMBER 31, 1982

(In Process of Liquidation)

ASSETS

CASH AND CASH EQUIVALENTS	\$ 801,738
RECEIVABLES:	-----
Trade, net of allowance of \$12,496 for uncollectible accounts	-
Intercompany	50,000
Other	28,953

	78,953
REFUNDABLE INCOME TAXES	-----
	112,513
NOTE RECEIVABLE	-----
	237,500

	\$1,230,704
	=====

LIABILITIES AND SHAREHOLDER'S INVESTMENT

LIABILITIES:	
Reserve for discontinuance of operations	\$ 131,549

SHAREHOLDER'S INVESTMENT:	
Capital stock, L1 par value (equal to \$2.80 par value at issue date), 1,000 shares authorized and outstanding	2,800
Paid-in capital	805,800
Retained earnings	290,555

	1,099,155

	\$1,230,704
	=====

The accompanying notes are an integral part
of this statement.

PUERTO RICO CONTAINER COMPANY LIMITED

NOTES TO NET ASSETS

DECEMBER 31, 1982

(In Process of Liquidation)

(1) Discontinuance of operations:

In December, 1980, the Company's shareholder approved a resolution calling for the discontinuance of the Company's operations, however, no formal plan of liquidation has been adopted. Management had provided a reserve as of December 31, 1980, to cover estimated losses from the liquidation of its assets and known close-down expenses. Currently, management cannot determine which, if any expenses will be incurred in the future, and has decided to continue to carry the reserve of \$131,549 in the statement of net assets as of December 31, 1982.

(2) Retained earnings:

Activity during 1982 in the retained earnings account is as follows:

Deficit, beginning of year			(\$1,548,756)
Gain on sale of plant and property	\$1,622,299		
Other receipts, net of expenses of \$34,572		<u>217,012</u>	<u>1,839,311</u>
Retained earnings, end of year			<u>\$ 290,555</u> =====

As a result of available net operating losses no provision for income taxes has been included above.

(3) Note receivable:

In September, 1981, the Company and its affiliate entered into an agreement with an unrelated third party for the sale of their equipment (at approximately 80% of book value) in exchange for noninterest bearing notes receivable, due in installments through March, 1983. The notes are collateralized by the equipment and second mortgages on certain real and personal property. In November, 1982, the outstanding note balance of \$237,500 was renegotiated. The new terms stipulate that the note will bear 12% interest, with principal and interest payable in monthly installments through October 31, 1985.

PUERTO RICO CONTAINER COMPANY LIMITED
SALE OF ASSETS AS OF 3/1/77

Schedule 1

INVENTORIES

PAPERBOARD INVENTORY

Rollstock	\$ 772,432
Down rolls	11,030

Total Paperboard		\$783,462
------------------	--	-----------

OTHER RAW MATERIALS

Corn Starch	\$ 15,864
Nabond Starch	745
Borax	610
Catalyst	315

Total Other Raw Mat.		17,534
----------------------	--	--------

REP. MATERIALS & SUPPLIES

Fuel Oil	\$ 4,522
Splicing Rolls	1,178

Total Rep. Mat.		5,700
-----------------	--	-------

Total Inventories		\$806,696
-------------------	--	-----------

MACHINERY AND EQUIPMENT
FAIR MARKET VALUE

Corrugator (and related items)	\$	\$ 520,500
Boiler - Old	6,300	
Boiler - New	68,300	
Water Reserve	62,800	

Total Steam System		137,400
--------------------	--	---------

Starch System		2,000
---------------	--	-------

Miscellaneous Equipment

Baler - Old	1,500
Baler - New	18,600
Clamp Trucks - 3	48,600

Total Miscellaneous		68,700
---------------------	--	--------

Total Machinery and Equipment		\$ 728,600
-------------------------------	--	------------

OTHER ASSETS

Prepaid Insurance		\$ 6,144
-------------------	--	----------

Total Assets Sold		\$1,541,440
-------------------	--	-------------

Method of Purchasing Assets above is as follows:

1. International Paper Company (Puerto Rico)
Incorporated will assume total liability
for Roll stock invoices payable to I.P.
Western outstanding at 2/28/77

\$1,271,831

2. International Paper Company (Puerto Rico)
Incorporated will issue an interest bearing
note to Puerto Rico Container Company payable
upon demand

269,609

Total

\$1,541,440 ✓

SALE OF CORRUGATOR ASSETS BY PRCC TO IPPR
AS OF 3/1/77
TAX CALCULATION OF GAIN

A. <u>Capital Gain</u>	<u>Alternative 1</u>	<u>Alternative 2</u>
Sales price	\$ 728,600	\$ 1,500,000
Adjusted basis of assets	<u>458,000</u>	<u>458,000</u>
	270,600	1,042,000
Capital gain tax @ 25%	\$ 67,650	\$ 260,500
 B. <u>Recapture of Flexible Depreciation</u>		
Excess of flexible depreciation over normal depreciation	Est. 44,000	44,000
Ordinary income tax @ 45%	19,800	19,800
 C. <u>LIFO Inventory Reserve</u>		
Restoration of LIFO		
Reserve to income upon transfer	123,486	123,486
Ordinary income tax @ 45%	<u>55,600</u>	<u>55,600</u>
Total Tax on Sale	<u>\$ 143,050</u>	<u>\$ 335,900</u>

PUERTO RICO CONTAINER COMPANY LIMITED
Bayamón, P. R.

Recd 5/12/77
1088

TAX EXEMPT EQUIPMENT TO BE TRANSFERRED

ITEM	DESCRIPTION	ORIGINAL COST	ACCUMULATED DEPRECIATION ⁷⁶ AS OF 12/31/77	DEPRECIATION FOR JAN & FEB. 1977	TOTAL ACCUMULATED DEPRECIATION AS OF 2/28/77	BOOK VALUE AS OF 2/28/77
2	250 HP Superior Boiler	16,551.41	10,226.61	301.18	10,527.79	6,023.62
4	Water Conditioner	5,505.74	5,505.74	-	5,505.74	-
5	Automatic Water Softener-Zeo	1,677.64	1,677.64	-	1,677.64	-
6	Boiler Chemical Feed	584.00	584.00	-	584.00	-
7	Piping Insulation	6,200.00	6,200.00	-	6,200.00	-
8	Clark Roll Clamp-On-CH-100	18,583.00	12,305.79	190.22	12,496.01	6,086.99
10	Starch Mixing Unit & Tanks	15,110.55	15,110.55	-	15,110.55	-
11	Boiler Return System-Stikle	5,085.89	5,085.89	-	5,085.89	-
12	Boiler & Starch Piping System	3,083.00	3,083.00	-	3,083.00	-
13	Trim Removal Blower System	32,026.38	32,026.38	-	32,026.38	-
14	672 SGL Economy Bailer	16,800.41	16,800.41	-	16,800.41	-
15	80" Comb. 2 Corr. DBL Facing Machine	395,120.28	395,120.28	-	395,120.28	-
16	Air Cooled Adjusto	1,122.79	1,122.79	-	1,122.79	-
17	Corr. Transmission	1,703.82	1,703.82	-	1,703.82	-
18	Shuttle Track	12,260.60	12,260.60	-	12,260.60	-
19	Wheel Conveyor	1,802.67	1,802.67	-	1,802.67	-
20	Rotary Cut- Off	24,220.07	24,220.07	-	24,220.07	-
21	Take Off Table	13,993.06	13,993.06	-	13,993.06	-
22	Single Facer Desk	51.69	51.69	-	51.69	-
23	Four Glue Applicators	860.00	860.00	-	860.00	-
24	Pneumatic Press. Arr. Top Corr. Roll	1,100.00	1,100.00	-	1,100.00	-
25	One Tank Preheater	295.00	295.00	-	295.00	-
26	One Rider Roll Cross Tie	1,179.96	1,170.17	3.26	1,173.43	6.53
27	One Single Preheating Unit	5,052.75	4,823.02	25.53	4,848.55	204.20
28	Two Static Drivers 50 HP - 125 HP.	21,344.38	9,810.37	349.52	10,159.89	11,184.49
29	One Web Tensioner	1,750.00	1,252.98	33.13	1,286.11	463.89
30	One Ludox Applicator	1,564.98	1,434.53	6.21	1,440.74	124.24
31	Auto Knife Control Unit	16,536.42	8,822.49	285.70	9,108.19	7,428.23
32	Two Single Preheaters	18,153.24	7,773.68	266.14	8,039.82	10,113.42
33	96" Pre-conditioning	10,365.51	4,749.07	170.20	4,919.27	5,446.24
34	Portable Sheet Counter	4,328.35	1,845.92	63.65	1,909.57	2,418.78
172	Corrugator Revision	226,719.63	57,290.05	3,322.15	60,612.20	166,107.43
178	Clamp Truck	22,374.22	2,974.35	340.35	3,314.70	19,059.52
181	Automatic Roll Splicer	46,414.97	6,170.24	706.05	6,876.29	39,538.68
182	Clamp Truck	23,955.72	3,184.59	364.41	3,549.00	20,406.72
-	Water Supply System (FIRE PREVENTION)	62,756.08	13,314.00	317.00	13,631.00	49,125.08
-	Boiler Construction In Progress - New	68,285.41	-	-	-	68,285.41
-	Baler Construction In Progress - New	18,612.09	-	-	-	18,612.09

Total..... 1,123,131.71 685,751.45 6,744.70 692,496.15 430,635.56

INTERNAL MEMORANDUM

IP 99 (N 2 77)



INTERNATIONAL PAPER COMPANY

NEW YORK OFFICE

TO: Files - Puerto Rico Operations DEPARTMENT:

FROM: Richard E. Greenberger DEPARTMENT: Tax

SUBJECT: Sale/Lease of Puerto Rico Facility

DATE: October 29, 1981

cc: S. T. Gillingham
C. Greenberg
W. Schorsch

Michael Leo, IPG Legal Counsel, has provided the Tax Department with the final documents as to the sales agreement between IPRR and PRCC, "Seller", and ABC Container Corporation, "Buyer", a party in Puerto Rico. Buyer has purchased the equipment and will lease, with an option to buy, the land and building. PRCC owns the land, building and certain machinery, while IPRR owns the balance of the machinery.

The documents having tax ramifications are as follows:

1. Agreement
2. Machinery Purchase Agreement
3. Lease with Option to Purchase Plant
4. Promissory Note

The essential terms of the sale and lease are discussed below.

1. In September, 1981, Buyer purchased the machinery and equipment for \$1,000,000 and will finance the cost by paying 60 percent of his profits, or a minimum of \$250,000 quarterly. Based on estimated fair market values, one half of all payments will be made to PRCC and the other half to IPRR. The purchase payments will accrue monthly beginning April 1, 1982. Seller has obtained from Buyer a non-interest bearing promissory note and a mortgage as security.

2. Buyer will pay all continuing costs and is obligated to pay the full \$1,000,000. Until the purchase price is paid in full, Seller may sell the machinery to any third party, subject to Buyer's right of first refusal. If the machinery is sold to a third party, Seller shall return to Buyer any amounts paid toward the purchase price in excess of \$10,000 each month that Buyer had possession of the machinery under the agreement.

3. As of October 1, 1981, Buyer shall pay \$25,000 rent each month to PRCC as a net lease on the land and building.

4. Buyer, as lessee, has the option to purchase the land and building for \$2,500,000. The option right is effective until March 31, 1983 or until he pays in full for the machinery, whichever is earlier. The option will continue, however, upon payment of 60 percent of monthly profits thereafter, with a minimum of \$250,000 quarterly, to the extent of the purchase price set forth above.

Subject to Buyer's right of first refusal, the premises may be transferred to a third party.

Certain tax issues have been raised:

1. Imputed interest income on promissory note.
2. The gain/loss to IPPR and PRCC on sale of the machinery.
3. The gain/loss to PRCC on the rental and sale of the building.
4. Payments of intercorporate debt.
5. Timing for liquidations of IPPR and PRCC.

Imputed Interest

The \$1,000,000 promissory note given by Buyer to purchase the machinery does not specify that interest will be charged on the balance due. If imputed interest is charged, a greater loss will be recognized on the disposition. With respect to PRCC which is subject to income tax only in Puerto Rico, we will need to ascertain from the local office of Arthur Anderson & Company as to whether imputed interest would be carved out of the sales price. IPPR, however, which files a U.S. income tax return, and has an income tax exemption in Puerto Rico, must meet the requirements of Section 483 IRC. According thereto, where a deferred payment sales contract calls for no interest or an unrealistically low rate of interest, a portion of the deferred payments must be treated as ordinary interest income rather than as part of the sale price.

The imputed interest will apply to all deferred payments to IPPR since they will begin April 1, 1982, six months after the date of sale. The rule is applicable to payments due more than six months after the date of sale under a contract which provides that one or more payments are due more than one year from the date of sale. Currently, the IRS imputes income semiannually at the rate of 10 percent where the stated interest is less than

9 percent simple interest. Interest from the date of each installment to the next is paid on the unpaid balance at the beginning of each semiannual period. (Reg. Sec. 1.483-1(a)(1))

The specific installment payments are not known at present. Depending upon Buyer's profits, the deferred payments may vary from a minimum of \$250,000 per quarter commencing April 1, 1982. Upon each receipt, the unstated interest should be segregated from the principal amount. The imputed interest income may approximate \$50,000, or 10 percent of \$500,000 due to IPPR. IPPR should still be exempt from any income tax under Section 936.

Gain/Loss on Machinery - IPPR and PRCC have each sold its machinery for \$500,000, payable out of future profits of ABC Container Corporation, as discussed above. For illustrative purposes only, unstated interest has not been segregated from the \$1 million sale price.

	<u>IPPR</u>	<u>PRCC</u>
Sale Price	\$500,000	\$500,000
Basis (6/30/81)	<u>(657,000)</u>	<u>(657,000)</u>
Loss	\$(157,000)	\$(90,000)

Both companies would incur a loss which would be recognized in 1981. With respect to IPPR, the loss would be reflected on a separate U.S. income tax return and would merely reduce its accumulated E&P. As mentioned above, IPPR is exempt from income tax in Puerto Rico.

PRCC which, as of December 31, 1980, had a Puerto Rico net operating loss approximating \$2.2 million will have an increased loss carryforward as a result of this loss. The Bahamian corporation is not subject to tax outside of Puerto Rico.

Gain/Loss on Land and Building - The land and building belong only to PRCC. Ken Waite, had discussed with Arthur Anderson & Company in Puerto Rico the taxability of the lease coupled with an option to purchase. They told him that the rental income of \$25,000 per month would be taxed currently as a lease. However, we understand that for Puerto Rico purposes, the option payments are not taxable until the transaction is closed and the title to the building is transferred, or the option lapses. The same holds true for U.S. purposes. See Rev. Rul 58-234, Koch v. Comm, 67 TC 71. Note that the option contract does not include an expiration date.

PRCC will recognize a gain upon the exercise of the \$2,500,000 option.

	<u>Land and Building</u>
Sales Price	\$2,500,000
Basis (6/30/81)	<u>913,000</u>
Gain	\$1,587,000

This gain should be eliminated by the Puerto Rico loss carry-forward. If, however, there were taxable income, the balance would be subject to a Puerto Rico 25 percent alternative tax on capital gains, if such tax is less than the normal tax (maximum rate is 40 percent). (13 L.P.R.A. Sec. 3117(c)(1)). Again, there are no U.S. taxes on the sale. The gain would eliminate the projected \$1 million deficit in E&P. (See schedule attached).

Intercompany Debt

Presently, PRCC owes IPPR approximately \$1.4 million. Similarly, IPPR owes IP affiliates, primarily IP Western, \$1.4 million. As cash is received by PRCC, it should first reduce the account payable to IPPR who in turn, should eliminate the debt to IP Western by 1983. (See schedule attached). Thereafter, IPPR should be liquidated (discussed below). Subsequently, after PRCC has eliminated its debt to IPPR, distribution can thereafter be made to IP in the U.S., which according to Arthur Anderson & Company in Puerto Rico, is subject to 29 percent withholding tax to the extent of the E&P of PRCC.

Liquidation of IPPR

IPPR should not liquidate until it receives the proceeds from the machinery. It would be prudent to postpone liquidation until 1983 when ABC will have satisfied its promissory note. Since default by Buyer would require repossession of the machinery, the earlier liquidation of IPPR would require that IP create a branch to own the machinery.

The gain on liquidation would be tax-free under both Puerto Rico and U.S. law. Written sources available on Puerto Rico law state that a parent corporation holding at least 80 percent of the stock on an exempted corporation is exempt from Puerto Rico income tax on its gain upon the complete liquidation of such corporation, provided the liquidation is carried out on or before the termination of its tax exemption grant. (The grant should not end before 1986). (13 L.P.R.A. 252 (c), See Tax Law Review, Winter 1977, "Operating in Puerto Rico in the Section 936 Era", Liquidation of an Exempted Corporation, Robert S. Griggs.)

Similarly, under U.S. law, Section 936 allows tax-free liquidation under Section 332. However, any distributions to IP in the U.S. would be subject to the 10 percent noncreditable tollgate charge.

Note, however, that the tax exempt status of IPPR may be in jeopardy in future years, due to lack of an active trade or business. The tax credit under Section 936 requires two conditions. First, 80 percent or more of its gross income for the three year period immediately preceding the close of the taxable year must be from sources within a U.S. possession. Second, which is more pertinent, 50 percent or more of its gross income during that same period must be derived from the active conduct of a trade or business within a possession. Furthermore, the three year test period means 36 months, not three tax years.

It appears that IPPR should satisfy these tests for 1981 and 1982. If, however, these above requirements are not met, IPPR would no longer have an exemption from U.S. income tax.

Liquidation of PRCC

It would be advisable to postpone the liquidation of PRCC until it has sold the land and building, in order to utilize its net operating loss carryforward.

It is possible that the sale with Buyer may not be completed as his payments are based upon the profitability of his business. In addition, a liquidation of PRCC prior to disposition of the building would result in IP having a branch in Puerto Rico. A subsequent sale of the assets directly by IP would give rise to a gain taxable in Puerto Rico, without benefit of a net operating loss.

After it has paid off its debts, the company can be liquidated, whereafter any available cash can be distributed to IP in the U.S. According to Arthur Anderson & Company in Puerto Rico a withholding tax of 29 percent would be charged on distributions to the extent of E&P and can be credited against U.S. tax imposed on the dividend distribution. Due to the current deficit in E&P, we presently estimate that if the sale were closed in 1985, E&P would be less than \$1 million.

On October 22, Ken Waite stated that IP is expecting a \$3.5 million cash offer from a third party for the entire Puerto Rico facility. Our acceptance would be contingent upon Buyer's not exercising its right of first refusal. I will update this status when more information is available.

Richard E. Greenberger

PAGE

10/81

E+P/

CASH FLOW ANALYSIS

EARNINGS & PROFITS - PER FORMS 2952	1980	1981	1982	1983
BEGINNING OF YEAR	< 890647 >	< 368242 >	< 1787789 >	< 1487789 >
E+P FROM OPERATIONS/SHORT-TERM	< 77595 >	< 1494547 >		
E+P FROM MAINTENANCE		75000	300000	300000
E+P FROM RENT OF BUILDING				
E+P FROM SALE OF LAND & BLDG	< 77595 >	< 1419547 >		
E+P FOR YEAR	< 368242 >	< 1787789 >	< 1487789 >	< 1187789 >
ENDING E+P				
CASH FLOW				
CASH 9/30/81		40000	40000	40000
CASH FROM DEPRECIATION				
CASH FROM SALE OF MFG			375000	125000
CASH FROM RENT OF BUILDING		75000	300000	300000
CASH FROM BUILDING OPERATION				750000
CASH FROM A/R		50000	247000	
PAYMENT OF DEBT TO EPP		< 125000 >	< 922000 >	< 1175000 >
PAYMENT OF A/P				
ENDING CASH -		90000	90000	70000
REMAINING DEBT TO EPP			65	
NET FOR PUERTO RICO TAXES		2565000	1443000	2685000
BEGINNING BAL				
12/31/79	⑤ < 858429 >			
12/31/80	⑥ < 1294972 >			
12/31/81	< 2153401 >			
12/31/82	< 77595 >			
CURRENT				
ENDING	< 2230976 >	< 368242 >	< 3350543 >	< 300000 >
				< 300543 >
① NOT ACQUIRED FOR				
UNTIL TRANSFERRED IS CLOSED				
IN 1984 OR 1985				
② FROM P.R. 1979 TAX RETURN				
③ EXCLUDING DEPRECIATION				

10/81

CASH FLOW ANALYSIS

	1980	1981	1982	1983
<u>EARNINGS & PROFITS</u>				
BEGINNING OF YEAR	2 255 936	2 592 651	2 915 182	2 915 182
E/P FROM OPERATIONS	336 715	-	-	-
E/P FROM MACHINERY SALE				
E/P FOR YEAR	336 715	322 531		
ENDING E/P	2 592 651	2 915 182	2 915 182	2 915 182
<u>CASH FLOW</u>				
CASH - 9/30/81		125 000	50 000	50 000
CASH FROM OPERATIONS		-	-	-
CASH FROM SALE OF MTR		-	375 000	125 000
CASH FROM P.R.C. DEBT		125 000	922 000	1 175 000
PAYMENTS TO IP WESTERN		<291 000>	<1297 000>	<250 000>
CASH FROM SALE OF INV.		50 000	-	-
CASH FROM A/R		41 000	-	-
ENDING CASH		50 000	50 000	1 100 000
ENDING I/C DEBT TO IP WESTERN		1 547 000	750 000	-



INTERNATIONAL PAPER COMPANY

SOUTHERN REGIONAL OFFICE

ATLANTA, GEORGIA

SUBJECT:

PUERTO RICO CONTAINER
TAX REFUND REQUEST

DATE:

August 21, 1985



TO:

Al Yanofsky
New York
38-54

I have made the last effort in trying to locate Puerto Rico year end General Ledgers for the years 1978 and 1979. I am at a loss as to where the missing year end ledgers could be since I have monthly ledgers for the remaining eleven months for both years.

Enclosed is the 1977 year end General Ledger that I was reluctant to forward to Arthur Anderson because the statement differs from the New York Income Statement by \$72,126. Laurie Salanitro located the 1980 December year end ledger in New York, but was unsuccessful in locating the missing years of 1978 and 1979. Laurie will forward the 1980 ledger to you.

If I can be of further help please call me.

Frank
Frank Dethloff

:mb

cc: J. E. Hardy
L. Salanitro

I N T E R N A T I O N A L P A P E R C O M P A N Y

INTERNAL MEMORANDUM
CORPORATE SECRETARY'S DEPARTMENT
PURCHASE OFFICE

TO : Distribution Below DATE : July 21, 1989
FROM : Betsy A. Byrnes *Betsy* CC : Y. Valdivieso
SUBJECT : Liquidation of International Paper
 Company (Puerto Rico) Inc. and
 Puerto Rico Container Limited

To keep you current on the above-mentioned liquidations, note the following:

International Paper Company (Puerto Rico) Inc.

- ♦ Shareholder's June 20, 1989 Consent approving the plan of liquidation is attached. It is imperative that all accounts be closed and transferred to the parent company, the stock cancelled and all bank accounts closed by December 31, 1989. Note paragraph marked "X" for further details.
- ♦ The Certificate of Dissolution was filed with the Secretary of State on June 30, 1989.
- ♦ On our behalf, CT Corporation is filing in Puerto Rico a certificate surrendering the Company's authority to do business in Puerto Rico.

Puerto Rico Container Company Limited

- ♦ As of July 21, the company is in liquidation, the liquidator being Mr. D.M. Wheaton, Grand Cayman, Cayman Islands, British West Indies.
- ♦ An attorney in Puerto Rico will be filing on our behalf a withdrawal certificate surrendering the Company's authority to do business in Puerto Rico.
- ♦ The final shareholders meeting is scheduled for September 21, at which time a final statement of accounts as at September 20th will be presented.
- ♦ As of July 21st, the assets fall under the control of the liquidator. Note that all net assets must be distributed before September 21st, the date of the final shareholders' meeting.

- ♦ All bank accounts must be closed before September 21, 1989.
- ♦ Investments can continue to earn interest up to the time of preparation of the final balance sheet (September 20, 1989).
- ♦ For your information, I enclose a copy of D. R. Duggan's July 17th letter regarding liquidation details.
- ♦ Attached are the financial statements as at July 20, 1989.

If you have any questions on Puerto Rico Container Company Limited, please call me (1582) or Mr. Duggan (9-011-44-624-23446). Questions on International Paper Company (Puerto Rico) Inc. may be directed to me.

Attachment

Distribution

R. Amen
S. Auster
J. Croft
C. Duerson
J. Finnegan
R. O. Forrest
C. Greenberg
S. Kite-Powell
T. Kliman
A. Lessin
S. Mortakis
F. Poper
L. Quintilliano
S. Schaeffgen
J. Taylor
T. Treichel

\BAB\07209001.MEM

INTERNATIONAL PAPER COMPANY (PUERTO RICO) INC.

Instrument of Consent of Unanimous Action of Shareholder
For Voluntary Dissolution

The undersigned, being the holder of all the issued and outstanding stock of International Paper Company (Puerto Rico) Inc., a Delaware corporation, does hereby consent and agree, pursuant to the General Corporation Law of the State of Delaware to the following action:

WHEREAS the Board of Directors of the Corporation has recommended approval of the plan of liquidation and dissolution contained herein,

NOW, THEREFORE, BE IT

RESOLVED that a plan of liquidation pursuant to Section 332 of the Internal Revenue Code hereby is formulated to effect such liquidation and dissolution of the Corporation in accordance with the following resolutions; and further

RESOLVED that the President or the Vice President of the Corporation is hereby authorized and directed to execute and file a Certificate of Dissolution, in accordance with Delaware Law, with the Secretary of State for the State of Delaware; and further

X RESOLVED that all of the property and assets of the Corporation, subject to its indebtednesses, obligations and liabilities, be distributed to and vest in International Paper Company ("International Paper") as a liquidating distribution in complete cancellation of all of the outstanding stock of the Corporation, International Paper to assume all of said outstanding indebtednesses, obligations and liabilities, such distribution to be made as promptly as practicable and in any event not later than December 31, 1989, and further

RESOLVED that the officers of the Corporation hereby are authorized and directed to pay all such fees and taxes and to do or cause to be done such further acts and things including, without limitation, the execution of deeds, bills of sale, and other documents of transfer, as they may deem necessary or proper in order to carry out the liquidation and dissolution of the Corporation and fully to effectuate the purposes of the foregoing resolutions.

Dated as of June 20, 1989

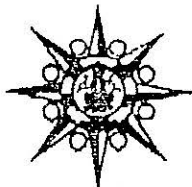
INTERNATIONAL PAPER COMPANY

By: Arthur Wallace
Arthur Wallace
Vice President and Secretary

ATTEST:

Mary A. Dorrille
Assistant Secretary

\\SEC\\0513801E.DOC



Management
International
(Bahamas) Limited

PO Box N1447, Nassau, Bahamas

Please reply:-
P.O. Box 34, Douglas,
Isle of Man, British Isles.

Telephone: 0624 23446
Telefax: 0624 28878
Telex: 627168 TARPON G

17th July, 1989

By telefax to: 0101 914 397 1567 (2 pages)

Ms. Betsy A. Byrnes,
International Paper Company,
Two Manhattanville Road,
Purchase,
New York 10577,
U.S.A.

Dear Ms. Byrnes,

Puerto Rico Container Company Limited

We thank you for your letter of the 7th July, 1989 and note that the second Extraordinary General Meeting will be held on the 21st July, 1989. We will arrange for the publication of the necessary notices and in this connection should be grateful if you would advise the proposed date of expiry of notice to creditors (one month is normal allowing time for publication) and proposed date of the Final Extraordinary General Meeting. We will also require five certified copies of the resolution adopted at the second Extraordinary General Meeting confirming that the Company has been placed in voluntary liquidation for submission to the Registrar General in Nassau.

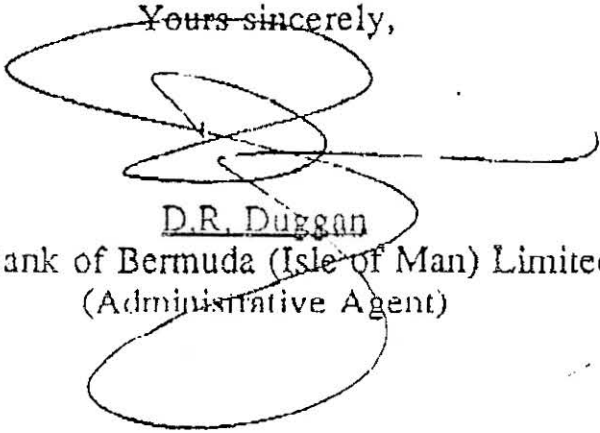
We would remind you that once the Company is in liquidation then the assets fall under control of the Liquidator who should authorise any distributions and that any net assets must be distributed prior to the Final Extraordinary General Meeting. We look forward to receiving a statement of assets and liabilities as at the eve of liquidation (20th July 1989) for the information of the liquidator, and in due course, a final statement showing the distribution of the assets and liabilities as will be presented at the Final Extraordinary General Meeting.

continued/.....

- 2 -

As previously advised, our fee for provision of the Liquidator is US\$1,000.00 and we should be grateful if you would forward a remittance of, say, US\$2,000.00 to cover the accrued and estimated fees and disbursements to close.

~~Yours sincerely,~~



D.R. Duggan

For Bank of Bermuda (Isle of Man) Limited
(Administrative Agent)

DRD/S/MI(B)L

PUERTO RICO CONTAINER COMPANY LIMITED

STATEMENT OF FINANCIAL POSITION

	JULY 20, 1989	DECEMBER 31, 1988
<u>ASSETS</u>		
CASH	\$15,923	\$185,923
TIME DEPOSITS	1,529,294	1,476,328
CERTIFICATES OF DEPOSIT	174,582	-
INTEREST RECEIVABLE	38,296	6,828
INCOME TAX REFUND (NOTE 1)	112,514	112,513
TOTAL ASSETS	<u>\$1,870,609</u>	<u>\$1,781,592</u>
 <u>LIABILITIES AND EQUITY</u>		
INTERCOMPANY PAYABLE (NOTE 2)	\$3,800	3,050
ACCRUED LIQUIDATION EXPENSES (NOTE 3)	6,000	-
COMMON STOCK	2,800	\$2,800
PAID-IN CAPITAL	805,800	805,800
RETAINED EARNINGS - BEGINNING	969,942	969,942
RETAINED EARNINGS - CURRENT	82,267	-
TOTAL LIABILITIES AND EQUITY	<u>\$1,870,609</u>	<u>\$1,781,592</u>

The accompanying notes are an integral part of this statement

PUERTO RICO CONTAINER COMPANY LIMITED

INCOME STATEMENT FOR THE PERIODS ENDING

	JULY 20, 1989	DECEMBER 31, 1988	DECEMBER 31, 1987
<u>REVENUES</u>			
INCOME FROM INVESTMENTS	\$89,017	\$109,213	\$88,672
OTHER INCOME	<u>-</u>	<u>-</u>	<u>-</u>
TOTAL REVENUE	<u>89,017</u>	<u>109,213</u>	<u>88,672</u>
 EXPENSES			
PROFESSIONAL FEES	6,750	3,050	
MISCELLANEOUS	<u>-</u>	<u>-</u>	<u>1,237</u>
TOTAL EXPENSES	<u>6,750</u>	<u>3,050</u>	<u>1,237</u>
NET INCOME (LOSS)	<u><u>\$82,267</u></u>	<u><u>\$106,163</u></u>	<u><u>\$87,435</u></u>

The accompanying notes are an integral part of this statement.

NOTES TO FINANCIAL STATEMENTS

1. Interest Receivable

Represents 1980 tax refund claim for a 1978 net operating loss carryback to the year 1977. This amount excludes interest of \$57 thousand.

2. Intercompany Payable

The following summarizes the balance of the Intercompany Payable account as of 06/30/89:

<u>Description</u>	<u>07/20/89</u>
Arthur Andersen Fees	\$3,800

3. Accrued Liquidation Expenses

Represents expected fees related to liquidation of PRCC as follows:

<u>Description</u>	<u>Amount</u>
Liquidation Fee	\$2,000
Arthur Andersen Fee	2,000
Lawyer Fee (Puerto Rico)	2,000
Total	<u>\$6,000</u>

GL340R 12/31/77

GENERAL LEDGER DETAIL
PUERTO RICO CONTAINER CO. LTD.

ACCOUNT NUMBER		DATE	REF NO	DESCRIPTION	OPENING	DEBIT	CREDIT	NET	CLOSING
E NO.	PER				BALANCE			CHANGE	BALANCE
10-00-00-43-L-412000 OF S MFC JOINT TAPE					7,991.63				
30013	12	123177				705.38			
30013	12	123177					292.25		
TOTALS FOR					7,991.63	705.38	292.25	413.13	8,404.76
10-00-00-43-L-413000 OF S STITCHING WIRE					5,840.02				
30013	12	123177				396.00			
TOTALS FOR					5,840.02	396.00		396.00	6,236.02
10-00-00-43-L-414000 OF S FLEXO INK					32,045.23				
30013	12	123177					2,434.75		
30074	12	123177				850.80			
TOTALS FOR					32,045.23	850.80	2,434.75	1,583.95CR	30,461.28
10-00-00-43-L-415000 OF S REGULAR INK					7,980.83				
30013	12	123177					1,426.80		
30074	12	123177				187.98			
TOTALS FOR					7,980.83	187.98	1,426.80	1,238.82CR	6,742.01
10-00-00-43-L-416000 OF S IMPREGNATING WAX					8,916.62				
TOTALS FOR					8,916.62				8,916.62

GL340K 12/31/77

GENERAL LEDGER DETAIL
PUERTO RICO CONTAINER CO. LTD.PAGE 2
DATE DECEMBER 1977

ACCOUNT NUMBER E NO. PER	DATE	REF NO	DESCRIPTION	OPENING BALANCE	DEBIT	CREDIT	NET CHANGE	CLOSING BALANCE
10-00-00-43-L-116004 TITCHING WIRE INVENTORY				3,498.00				
30013	12	123177				396.00		
TOTALS FOR				3,498.00		396.00	396.0000	3,102.00
10-00-00-43-L-116005 LEXO INK INVENTORY				11,189.70				
30003	12	123177			1,629.03			
30005	12	123177			1,480.80			
30013	12	123177			2,434.75			
30074	12	123177				850.80		
TOTALS FOR				11,189.70	5,544.58	850.80	4,693.78	10,893.48
10-00-00-43-L-116006 REGULAR INK INVENTORY				2,754.01				
30002	12	123177				765.40		
30003	12	123177			1,635.79			
30013	12	123177			1,426.80			
30051	12	123177			33.66			
30074	12	123177				187.98		
TOTALS FOR				2,754.01	3,096.25	953.38	2,142.87	4,896.86
10-00-00-43-L-116009 IFC JOINT TAPE INV 2.5 INCHES				740.43				
30006	12	123177			193.50			
30013	12	123177				21.57		
TOTALS FOR				740.43	193.50	21.57	171.93	912.36

BILL OF SALE

AGREEMENT entered into this
28th day of February, 1977 by and
between Puerto Rico Container
Company Limited, a Bahamian corpora-
tion (hereinafter referred to as
the "Seller") and International
Paper Company (Puerto Rico), Inc.,
a Delaware corporation (hereinafter
referred to as the "Purchaser").

In consideration of
(\$) paid by Purchaser, receipt of which is hereby
acknowledged by the Seller, the Seller does hereby sell, transfer
and convey to the Purchaser all its right, title and interest to
all of the assets of the Seller including without limitation:
machinery, equipment, inventory, supplies; all customer lists,
good will and all other intangible rights or property of every
kind relating to the business of the Seller; and, all business
records and correspondence relating to the operations of the
Seller. The only assets to be excluded are those specifically
listed in the schedule annexed as "Exhibit A". The Seller hereby
covenants with the Purchaser that it is the lawful owner of all
of said assets, and that the same are free and clear of mortgages,
mechanics' liens and other liens and encumbrances of every kind and
character.

IN WITNESS WHEREOF, each of the parties hereto has caused
this Bill of Sale to be executed on its behalf and its corporate
seal to be hereunto affixed by its officers thereunto duly author-
ized, on the date shown above.

PUERTO RICO CONTAINER COMPANY LIMITED

By: _____

INTERNATIONAL PAPER COMPANY
(PUERTO RICO), INC.

By: _____

Attachment Two

Real Estate

INTERNATIONAL PAPER

INTERNATIONAL PLACE 1 • 400 POPLAR AVENUE • MEMPHIS, TENNESSEE 38197

CALVIN DUERSON
Manager - International Tax

PHONE (901) 763-6000
Direct (901) 763-6091
Telecopier (901) 763-6130

October 17, 1989

Ms. Alma Lopez
Arthur Andersen & Company
Pan Am Building
255 Ponce de Leon
Hato Rey
San Juan, Puerto Rico 00936

Re: PRCC Tax Refund

Dear Ms. Lopez:

Enclosed is a copy of the deed of purchase and sale by Puerto Rico Container Company (PRCC) Limited for its sale of real property to Puerto Rico Box Company, Inc. on November 10, 1982.

This should provide substantiation that PRCC does not owe real estate tax on real property, since it has not owned the property for about seven years.

Regards,


CALVIN DUERSON

CWD/rc
enclosure

cc: C. Greenberg
K. Pope

----- NUMBER FIFTY FIVE -----

-----DEED OF PURCHASE AND SALE-----

---In the Municipality of San Juan, Commonwealth
of Puerto Rico on this tenth -----
----- day of November, nineteen hundred eighty
two (1982). -----

-----BEFORE ME-----

---DONALD E. HULL, Attorney-at-Law and Notary Pub-
lic in and for the Commonwealth of Puerto Rico,
with residence in San Juan, Puerto Rico and an
office on the tenth floor of the Pan Am Building
at two hundred fifty-five (255) Ponce de León Ave-
nue in the Hato Rey section of the Municipality of
San Juan, Puerto Rico. -----

-----APPEAR-----

---AS PARTY OF THE FIRST PART: PUERTO RICO CON-
TAINER COMPANY LIMITED, a corporation organized
pursuant to the laws of the Bahama Islands and
duly qualified to do business in the Commonwealth
of Puerto Rico (hereinafter referred to as the
"Seller"), represented herein by its Attorney-in-
Fact, Michael S. Leo, who is of legal age, mar-
ried, an attorney and resident of the State of New
York. -----

---AS PARTY OF THE SECOND PART: PUERTO RICO BOX
COMPANY, INC., a corporation duly organized and
existing under the laws of the Commonwealth of
Puerto Rico (hereinafter referred to as the
"Buyer"), represented herein by its President,
Roberto Valentín, who is of legal age, married, a
businessman and resident of Guaynabo, Puerto Rico.

---I, the Notary, attest that I am personally ac-
quainted with the appearing parties, who assure me
that they have, and in my judgment they do have,
the necessary legal capacity and authority to exe-

execute this deed, whereupon, freely and of their own will and accord, they -----

-----STATE-----

---FIRST: Title. Seller is the owner in fee simple (pleno dominio) of a parcel of land located in the Municipality of Bayamón, Puerto Rico, more completely, accurately and fully described as follows (hereinafter referred to as the "Property"):

-----"RUSTICA: Parcela de terreno compuesta de cincuenta y seis mil setecientos noventa y cuatro punto setecientos setenta y tres (56,794.773) metros cuadrados, equivalentes a catorce punto cuatrocientos cincuenta (14.450) cuerdas, equivalentes a catorce punto cero treinta y cuatro (14.034) acres, de forma irregular en el barrio de Hato Tejas de Bayamón, en linderos por el Norte y Este, con terrenos propiedad de Ciento Diecisiete (117) Fashions Inc.; por el Sur, con propiedad de Ciento Diecisiete (117) Fashions Inc. y de Norman Parkhurst; por el Oeste, con Norman Parkhurst y Sucesión N. González y Gregorio Aponte." -----

-----The Property was acquired by Seller as appears from Deed Number Fifty (50) executed on the seventeenth (17th) day of November, nineteen hundred sixty-one (1961) before Notary Public Francis González Oliver. The Property is recorded at page ninety-three (93) of volume five hundred five (505) of Bayamón I, property number twenty-two thousand nine hundred fifty-one (22,951), Registry of Property of Puerto Rico, First Section of Bayamón. --

---SECOND: Liens and Encumbrances. The Property is affected by the following ~~Liens~~ and encumbrances: -----

-----One. An easement in favor of the Puerto Rico Railway Light and Power Company; and -----

-----Two. An easement in favor of the Puerto Rico Water Resources Authority. -----

---THIRD: Representations and Warranties of Seller. Seller represents and warrants to the Buyer that it has good and marketable fee simple (pleno dominio) title to the Property, susceptible of

recordation in favor of Buyer without any defect of any kind, free and clear of all liens, claims, exceptions, encumbrances, tenancies, litigation and rights of third parties, except as stated in paragraph SECOND above. -----

-----Seller does not warrant, however, the condition of the structures on the Property, which are sold by the Seller and purchased by the Buyer on an "AS-IS, WHERE-IS" basis. -----

---FOURTH: Sale. Seller hereby sells to Buyer, and Buyer hereby purchases from Seller, the Property as described in paragraph FIRST of this deed, together with all of its respective rights, easements, servitudes and appurtenances thereto and all structures erected thereon without any limitations or reservations whatsoever, for a total purchase price of TWO MILLION FIVE HUNDRED THOUSAND DOLLARS (\$2,500,000.00) which Buyer pays to Seller in this act, and the receipt of which is hereby acknowledged by Seller. -----

---FIFTH: Right to Possession. This deed shall entitle Buyer to enter into possession of the Property without any additional formality or request, and subject to the provisions of paragraph THIRD of this deed, Seller hereby undertakes and accepts all of the obligations imposed upon a vendor of immovable property under the Civil Code of Puerto Rico. -----

---SIXTH: Successors and Assigns. All of the terms, conditions and provisions of this deed shall apply to and be binding upon the successors and assigns of the appearing parties and all persons claiming under or through any such successors or assigns. Neither this deed nor any term, condition or provision hereof may be changed, waived,

discharged or terminated orally except by an instrument in writing. -----

---SEVENTH: Additional Documentation. The parties hereto agree to execute and deliver any additional instruments and documents which may be necessary to record the Property herein transferred in fee simple (pleno dominio) in the Registry of Property in the name of Buyer. -----

---EIGHTH: Taxes. All property taxes incurred or accrued with respect to the Property conveyed by this deed after the date hereof shall be for the account of Buyer. -----

---NINTH: Expenses of Deed. The Internal Revenue stamps required by law to be affixed to the original of this deed and the applicable notarial fee shall be paid for by Seller; the Internal Revenue stamps required by law to be affixed to the first certified copy of this deed and all expenses of filing and recording this deed in the Registry of Property shall be paid for by Buyer. -----

---I, the Notary, made to the appearing parties the required legal warnings concerning the execution of this deed. I advised them of their right to have witnesses present at the execution thereof, which they waived, and to read the deed by themselves, which they did. ~~-----~~ -----

---After having read this deed, the appearing parties fully ratified and confirmed their statements as the true and exact expression of their stipulations, terms and conditions. Whereupon, they signed their initials at the left hand margin of -----

each and every folio of this deed and signed the
last page thereof, ALL BEFORE ME. -----

---I, the Notary, ATTEST AND GIVE FAITH. -----

-----NUMBER FIFTY-SEVEN-----

-----DEED OF PROTOCOLIZATION-----

---In the City of San Juan, Commonwealth of Puerto Rico, this tenth ----- day of November, nineteen hundred eighty-two (1982). -----

-----BEFORE ME-----

---DONALD E. HULL, Attorney-at-Law and Notary Public with an office in the Pan Am Building, Hato Rey, San Juan, Puerto Rico and residence in San Juan, Puerto Rico, and being duly authorized to act as such Notary in all the territory of the Commonwealth of Puerto Rico. -----

-----PERSONALLY APPEARS-----

---MICHAEL S. LEO, of legal age, married, attorney and resident of the State of New York. -----

---I, the Notary, do hereby certify that I personally know the appearing party herein and that I know his personal circumstances by information which he has given to me. He gives assurance that he has legal capacity necessary for this act and I, the subscribing Notary believe that he, in fact, does have such legal capacity, whereupon of his own free will and accord he -----

-----STATES-----

---FIRST: That he has in his possession and shows to me one Power of Attorney executed in his favor, as follows: -----

---A. By PUERTO RICO CONTAINER COMPANY LIMITED, a corporation duly organized and existing under the laws of the Bahama Islands, represented therein by its Vice President, Charles Greenberg, before Notary Ann C. Kearney in the State of New York dated the first (1st) day of November, nineteen hundred eighty-two (1982), which Notary's signature is verified by a certificate issued by Norman



Goodman, County Clerk and Clerk of the Supreme Court of the State of New York, in and for the County of New York, on the ninth (9th) day of November, nineteen hundred eighty-two (1982). ---

---SECOND: That in order to duly protocolize the Power of Attorney according to law, the appearing party delivers it to me, the Notary, to annex hereto and make a part hereof, and thus a part of my protocol of public instruments for the current year. -----

---The appearing party to this deed accepts the same as drafted and I, the Notary, made to the appearing party the necessary legal warnings concerning the execution of this deed and he was fully advised by me thereon. -----

---I advised the appearing party as to his right to read the deed by himself, which he did, and to have witnesses to the execution thereof, which he waived. After having read the contents of this deed as stated in all preceding paragraphs, the appearing party fully ratified and confirmed the statements contained herein as the true and correct embodiment of his stipulations, terms and conditions. -----

---Whereupon, the appearing party signed this deed before me, the Notary, and affixed his initials on each and every folio of this deed. -----



POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS:

That the undersigned, PUERTO RICO CONTAINER COMPANY LIMITED, a corporation duly organized and existing under the laws of the Bahama Islands, does hereby CONSTITUTE and APPOINT Michael S. Leo, of legal age, married, attorney and resident of the State of New York, the true and lawful attorney-in-fact of the undersigned, to have power and authority, in the name, place and stead of the undersigned, to execute a Deed of Purchase and Sale by which the undersigned shall sell to PUERTO RICO BOX COMPANY, INC., a Puerto Rico corporation, a parcel of land described as follows:

RUSTICA: Parcela de terreno compuesta de 56,794,733 metros cuadrados, equivalentes a 14.450 cuerdas, equivalentes a 14.34 acres de forma irregular en el barrio de Hato Tejas de Bayamón, en lindes por el Norte y Este con terrenos propiedad de 117 Fashions Inc.; por el Sur con propiedad de 117 Fashions, Inc. y de Norman Parkhurst; por el Oeste con Norman Parkhurst y Sucesion N. González y Gregorio Aponte.

Said parcel is recorded in the Registry of Property of Puerto Rico, First Section of Bayamón, at page 93 of Volume 505 of Bayamón I, property number 22,951.

The selling price of said parcel of land shall be \$2,500,000.00

Said attorney-in-fact shall have power and authority to execute and deliver all such other public and private instruments or other documents containing such terms and provisions as said attorney-in-fact shall consider necessary or appropriate for the purpose of carrying out any of the foregoing, it being the intent hereof that insofar as any Registrar of Property of the Commonwealth of Puerto Rico is concerned, the execution by said attorney-in-fact of any instrument or document related to any of the foregoing shall be final and conclusive evidence that he has received appropriate and sufficient authorization from the undersigned for such purpose.



A handwritten signature, likely of the attorney-in-fact, Michael S. Leo.

AND THE UNDERSIGNED DOES HEREBY RATIFY AND CONFIRM all whatsoever that said attorney-in-fact shall do or cause to be done by virtue of the powers hereby granted.

IN WITNESS WHEREOF, this Power of Attorney is executed on behalf of the undersigned at New York, New York, this 1st day of November, 1982.

(CORPORATE SEAL) PUERTO RICO CONTAINER COMPANY LIMITED

By: Charles Greenberg
Charles Greenberg
Vice President

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss:

On November 1, 1982 before me, the undersigned, Notary Public in and for said State, personally appeared Charles Greenberg, known to me to be the Vice President of the corporation that executed the within Instrument on behalf of the corporation therein named, and acknowledged to me that such corporation executed the within Instrument pursuant to its by-laws or a resolution of its Board of Directors.

WITNESS my hand and official seal.

Ann C. Kearney
Notary Public

ANN C. KEARNEY
NOTARY PUBLIC, State of New York
No. 31-7192120
Qualified in New York County
Commission Expires March 30, 1984



(ATTACH COUNTY CLERK'S CERTIFICATE)

COUNTY CLERK
NEW YORK COUNTY

Nº 86165 Form 1

State of New York)
County of New York) ss:

I, NORMAN GOODMAN, County Clerk and Clerk of the Supreme Court of the State of New York, in and for the County of New York, a Court of Record, having by law a seal, DO HEREBY CERTIFY pursuant to the Executive Law of the State of New York, that

whose name is subscribed to the annexed affidavit, disposition, certificate of acknowledgment or proof, was at the time of taking the same a NOTARY PUBLIC in and for the State of New York duly commissioned, sworn and qualified to act as such; that pursuant to law, a commission or a certificate of his official character, with his autograph signature has been filed in my office; that at the time of taking such proof, acknowledgment or oath, he was duly authorized to take the same; that I am well acquainted with the handwriting of such NOTARY PUBLIC or have compared the signature on the annexed instrument with his autograph signature deposited in my office, and I believe that such signature is genuine.

IN WITNESS WHEREOF, I have hereunto set my hand affixed my official seal this

NOV 9 1982

- FEE PAID \$3.00

208

Norman Goodman
County Clerk and Clerk of the Supreme Court, New York County

---I, the Notary, do hereby certify as to everything stated and contained in this deed. -----

-----SIGNED AND INITIALLED: MICHAEL S. LEO.-----
 -----SIGNED, SEALED, MARKED, AND FLOURISHED: DONALD E. HULL.-----

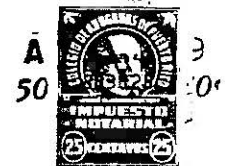
-----The corresponding Internal Revenue and Notarial stamps have been cancelled on the original.-----

-----I, the Notary, CERTIFY that the foregoing is a true and exact copy of deed number 57, the original of which forms part of my protocol of public instruments for the year 1982.-----

-----IN WITNESS WHEREOF, and at the request of Michael S. Leo, I issue FIRST CERTIFIED COPY which I sign, seal, mark, and flourish, at San Juan, Puerto Rico, on the same date of its execution.-----
 -----I ATTEST.-----

Donald E. Hull

50' 50'
 A4926899



TRIBUNAL SUPREMO DE PUERTO RICO

Inscrito este documento en el Registro de
Poderes a mi cargo bajo el número 410-276
folio 276 tomo 410 en San Juan,
Puerto Rico, el día 12 de Jun. de
1982 a las 8:40 a.m.

San Juan, Puerto Rico,
12 de Jun. de 1982

CERTIFICO

DIRECTOR DE INSPECCIÓN
DE PROTOCOLOS

Por:

Carlos M. Quirós
Oficial Autorizado



Attachment Three

Record Retention Schedules

Provided in electronic format via email

MASTER RECORDS RETENTION SCHEDULE – 2012 UPDATE

Effective January 2012

<i>RECORDS FUNCTION</i>	<i>RECORDS SERIES ID</i>	<i>RECORDS SERIES NAME</i>	<i>RECORDS SERIES DESCRIPTION</i>	<i>OFFICE OF RECORD</i>	<i>OFFICIAL VERSION RETENTION</i>	<i>COPY VERSION RETENTION</i>
Administrative	00962.0	Administrative Support - Calendars and Day Planning	Contains calendars and day planning information. Includes date, time, event description, and related information.	Department	No Longer Than 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00963.0	Administrative Support - Contacts and Mailing Lists	Contains internal and external contact data, directories, mailing and distribution lists, and related information.	Department	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00961.0	Administrative Support - Correspondence	Contains general and routine correspondence that does not set policy or establish procedures. Includes transmittals (i.e., fax cover sheets), acknowledgments, general requests for information or publications, announcements, notices, reading files, and related routine memos.	Department	No Longer Than 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00964.0	Administrative Support - Travel Planning	Contains itineraries, confirmations, and other travel planning records.	Department	No Longer Than 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00950.0	Buildings and Grounds Security	Documents monitoring of access to company premises. Includes visitor logs, parking, surveillance digital	Location	Security Badges: Until Expired; Other Records: No	As Long As Needed For Business Purposes, But No

MASTER RECORDS RETENTION SCHEDULE – 2012 UPDATE

Effective January 2012

<i>RECORDS FUNCTION</i>	<i>RECORDS SERIES ID</i>	<i>RECORDS SERIES NAME</i>	<i>RECORDS SERIES DESCRIPTION</i>	<i>OFFICE OF RECORD</i>	<i>OFFICIAL VERSION RETENTION</i>	<i>COPY VERSION RETENTION</i>
			files, security badges, and related records.		Longer Than 3 Years	Longer Than Official Version Retention Period
Administrative	00934.0	Internal Operational / Management Reporting	Contains internal reporting not specified in other areas of the Master Records Retention Schedule. Includes management reporting, balanced scorecards, department goals and objectives, headcount analysis and reports, trending analysis, and any other reporting for operational analysis.	Office Preparing Report	Historical Trending Reports: No Longer Than 10 Years; Other Records: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00919.0	Meeting Management & Participation	Documents company committees and internal meetings, except for those related to the Board of Directors and those specified in other areas of the Master Records Retention Schedule. Includes agenda, minutes, exhibits, notes, and related records.	Meeting Chair	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00922.0	Policies, Procedures, Guidelines, and Processes	Contains internally-developed policies, procedures, guidelines, and processes. Includes records supporting their development.	Office of Issuance	Compliance, Environment Health & Safety, and Human Resources Policies: After Superseded Or Outdated + 10 Years; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Administrative	00933.0	Policies, Procedures, Guidelines and Processes - Records Management	Contains records management-related internally-developed policies, procedures, guidelines, and processes. Includes records supporting their development.	Legal	Policies and Master Records Retention Schedule: After Superseded Or Outdated + 6 Years; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00929.0	Presentations and Speeches	Contains speeches and presentations given to internal and external audiences by company personnel. Includes presentation slides, scripts, notes, and related records.	Office Delivering the Presentation / Speech	No Longer Than 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00926.0	Records Storage & Destruction	Documents records sent to off-site storage and records destroyed on-site and off-site. Includes transmittal forms describing records sent to storage, permanent withdrawals, destruction notifications, and certificates of destruction from third party service providers.	Office Responsible for Records	After Destroyed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00927.0	Reference Materials	Contains working files and reference materials used to track, locate, retrieve, or provide information. Includes filing lists, logs, published resources, research, articles, office equipment and personal computing reference materials, regulatory and	Department	Until Superseded Or No Longer Needed, and Review Regularly For Disposal	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			industry information, vendor information files, and other reference materials used for business purposes.			
Administrative	00935.0	Service Requests	Documents requests for services such as information technology, facilities and maintenance, technical services, mailings, or other internal services. Includes request forms, actions taken, resolutions, and any follow-up with the requester.	Department Processing Request	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00945.0	Surveys	Documents internal and external surveys, questionnaires, and studies such as customer, employee, salary, mystery shopper, general job demand, and benchmarking. Includes questions, results, and interpretations.	Office Conducting Survey	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Corporate	11162.0	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Agreements and Closing Documents	Contains agreement and required closing documents. Includes letter of intent, applications, opinions, Securities & Exchange Commission (SEC) registration statements, regulatory filings, final agreement, and related records.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11161.0	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Due Diligence	Contains documents generated and gathered during the course of due diligence for proposed mergers, sales, acquisitions, and joint ventures. Includes reports, correspondence, analyses, and other records used to evaluate the proposed transaction. Note: For successful transactions, records received from the other party that become official records of International Paper should be reclassified under the appropriate records series.	Offices Involved In Due Diligence Process	Successful Transaction Unless Final Agreement Stipulates Retention: After Agreement Executed + 6 Years; Transaction Not Completed: Follow Terms Of Agreement Or No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11117.0	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Transition Services	Documents services provided to non-International Paper entities during transaction transitions. Includes copy of contract, licenses and certifications, reports, correspondence, timesheets, and related records.	Offices Involved in Transitional Process	All Tax Audits Completed and Contract Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11003.0	Board and Committees Minute Books and Records	Documents actions taken by the Board of Directors and Committees of the Board for International Paper and its subsidiaries. Includes pre-read	Corporate Secretary (International Paper and US	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official

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			materials, agendas, minutes, exhibits, appointments and resignations, and related records.	Subsidiaries; Responsible Party (Non-US Subsidiaries)		Version Retention Period
Corporate	11022.0	Board of Directors and Officers - Selection and Retention	Documents the selection and retention of Board of Directors and the appointment of officers. Includes backgrounds of individuals who have served on the Board of Directors or as company officers.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11102.0	Charitable Contributions	Documents charitable contributions made by a location or department. Includes applications, correspondence, donation description, authorizations, copy of documentation sent to Accounts Payable, and related records.	Office Approving Contribution	Approved and Tax Deductible: All Tax Audits Completed; Denied and Non-Tax Deductible: No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11103.0	Communications - External	Contains external communications concerning issues affecting the company and matters of interest to the public. Includes press releases, policy statements, responses to questions from the public or the media, and related records.	Office Issuing the Communication	No Longer Than 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11104.0	Communications - Internal	Contains internal company communications to employees concerning programs, plans, and projects. Includes news and information, policy statements, correspondence, and other records.	Office Issuing the Communication	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Corporate	11105.0	Company Performance Reporting	Documents financial results and business plans communicated to analysts, rating agencies, investors, and other external parties. Includes reports, presentations, workpapers, and related records.	Investor Relations	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11007.0	Compensation - Board of Directors	Documents development, participation, implementation, and administration of the company's Board of Directors' compensation plan. Includes plan design, plan documents, fees and expenses documentation, payouts, and related records.	Corporate Secretary; Global Compensation & Benefits	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11019.0	Corporate Organization and Ownership	Contains articles of incorporation, bylaws, charters, and other records documenting the formation, structure, reorganization, and dissolution of the company and its subsidiaries. Includes regulatory applications and approvals, registration statements, trade names (such as doing business as, also known as), and other supporting records.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11021.0	Delegation of Authority	Documents the internal delegation and distribution of authority within the company. Includes records identifying persons authorized to sign certain documents (such as contracts), approve payments, or take other	Office Controlling the Delegation Authority	Until Superseded Or Obsolete	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			action on behalf of the company.			
Corporate	11106.0	Event Management	Documents charitable, political, corporate, and community programs and events coordinated by the company, including Board of Directors' meetings. Includes lists of participants, program / event information, results, and other records.	Office Managing the Event	Board-Related Events: 10 Years; Other Events: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11107.0	Executive Biographies	Biographical information sheet on key executives and officers. Includes photos, assignment history, and related records.	Communications; Global Compensation & Benefits	Employee Termination + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11108.0	Foundation Management	Documents oversight and administration of the Foundation. Includes annual reports, analyses, expenditures, registrations, tax reporting, and related records.	Foundation	All Tax Audits Completed and Foundation Operations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11109.0	Image Management	Documents digital and analog image assets created by or for the company and used to document company assets and events. Includes photos, negatives, slides, transparencies, videos, and digital versions.	Office Responsible for Controlling Image Access	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11110.0	Industry Reporting	Documents information provided to industry and trade associations. Contains reports, studies, papers, and	Office Submitting Report	5 Years	As Long As Needed For Business Purposes, But No

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			other records covering market share, sales, production, pricing, and related information.			Longer Than Official Version Retention Period
Corporate	11111.0	Legislative Tracking	Documents tracking of legislation impacting the company. Includes draft bills, amendments, background material, lobby reports, trade associated reports, and other related records.	Government Relations	No Longer Than 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11120.0	Lobbying Activities	Documents issues and actions made to influence decisions of legislators, government agencies, constituents, and advocacy groups. Includes position papers, letters, studies, committee hearings, and related records.	Government Relations	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11112.0	Media Coverage	Documents externally generated media coverage of company activities. Includes newspaper and journal articles, photographs, videos, and related records.	Communications	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11113.0	Political Action Committee Management	Documents committee organized to raise funds in support of candidates or causes of interest to the company. Includes Political Action Committee (PAC) Board meetings and approval information, committee information, receipts, bank account statements and reconciliations, candidate letters, check requests, disbursements, and	Government Relations	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			other related records.			
Corporate	11114.0	Public Information Requests	Documents requests for information received from ratings agencies, investors, analysts, and the public. Includes correspondence, company publications, and related records.	Investor Relations	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11035.0	State Business Licenses	Documents the company's right to conduct business in each state. Includes applications and filing packages, registrations, licenses, certifications, records of the registered process agents authorized to act on behalf of the company, and related records.	Corporate Secretary	Registered Process Agents Records: 10 Years; Other Records: Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11036.0	Stock Exchange Listings	Documents stock exchange listings including the New York Stock Exchange (NYSE). Includes application, listing agreement, trade volume, market value of shares, and other records supporting the continued listing on the exchange.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11116.0	Stockholder Records	Documents company stock issuance and program. Includes annual reports, stock transfers, stock cancellations, dividend distributions, proxy and voting records, and related records.	Corporate Secretary	Proxy and Voting Records: 6 Years; Other Records: Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period



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Corporate	11051.0	Stockholder Records - Shareholder Listings	Contains annual shareholder listing.	Corporate Secretary	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Environment, Health & Safety	09085.0	Audits and Assessments - Internal - Environment, Health & Safety	Documents internal audit reports and assessments on compliance with environmental, safety, and health requirements such as health and safety audits, internal assessments including key elements survey (KES), risk management plans, process safety management (PSM), process hazard analysis (PHA), and others. Includes reports, workpapers, corrective action plans, supporting documentation, and related records.	Location	Last Two PSM Audits: Issue Date + 6 Years; Internal Assessments: After Superseded Or Outdated; Other Audits and Records: After Audit Issued / Correction Plan Completed + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09150.1	Consent Orders, Citations and Notices of Violations (NOVs)	Documents compliance with citations, consent orders, agreements, warnings, and notices of violations received from government environmental, safety, and health inspectors for violations of environmental, safety, and health regulations (including those from the Environmental Protection Agency (EPA), Occupational Safety & Health Administration (OSHA), and Department of Transportation (DOT)), fire marshals, and other state or local agency inspectors. Includes consent orders, agreements, citations, notices, assessments, corrective action plans, response and remediation documentation, correspondence, and related records.	Location	Consent Orders and Agreements: After Resolved and Obligations Cease + 10 Years; Other Records: After Resolved + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Environment, Health & Safety	09005.0	Emergency Response and Prevention Plans	Contains Storm Water Pollution Prevention (SWPP), Spill Prevention Control and Countermeasure (SPCC), and other environmental and safety / accident prevention plans such as those for fire and natural disaster. Includes plans, risk assessments, worst case scenarios, and related records.	Location	After Superseded Or Outdated Or Per Permit Requirements, Whichever Is Longer + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09300.0	Environmental and Hazardous Materials Program Management	Documents the management and administrative oversight of the company's environmental and hazardous materials programs. Includes program development records, regulatory compliance requirements, surveys, action plans, project oversight documentation, employee communications, and other related documentation.	Corporate Environment, Health & Safety; Location	After Superseded Or Outdated + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09270.0	Environmental Credits Management	Documents management of the carbon off-set, greenhouse gas, wetlands, or other environmental credit programs. Includes applications, credits, purchase and sale documentation, invoices and payments, inventory, audits, reports, correspondence, and related records.	Corporate Environment, Health & Safety; Tax	After Sold Or Expired + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09015.0	Environmental Monitoring and Testing	Documents required monitoring and testing for air and water quality, pollutant emissions, equipment leaks, and other matters mandated by	Location	5 Years Unless Longer Retention Mandated By Permit, Agreement, Order, or	As Long As Needed For Business Purposes, But No Longer Than Official

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			regulation, permit, agreement, or order. Includes performance tests, monitoring inspections, emission averaging, continuous flow measurements, reports, equipment calibrations, test results, strip chart recordings, and other records.		Regulatory Submission	Version Retention Period
Environment, Health & Safety	09352.0	Environmental Permits - Exemptions	Documents reasons for claiming exemption from procuring an environmental permit. Includes correspondence, analyses, reports, calculations, and other supporting records.	Location	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09351.0	Environmental Permits - Issued	Documents issuing of environmental permits except permits for solid waste and hazardous materials storage facilities. Includes applications, environmental statements, plans, analyses, reports, and supporting documentation. Note: For permits related to solid waste and hazardous materials storage facilities, see "Solid Waste and Hazardous Materials Storage Facilities".	Location	Final Applications and Permits: Permanent; Supporting Documentation: After Permit Superseded Or Expired + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09160.0	Equipment Safety Inspection and Testing	Contains records pertaining to equipment safety inspections and testing (such as those for power industrial trucks [lift trucks], fire protection equipment, cranes,	Location	Most Current Until Superseded: 5 Years; Annual: 3 Years; Quarterly: 2 Years; Monthly: 1 Year;	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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			elevators, and fired and unfired pressure vessels). Includes inspections, test results, remedial actions, and related records.		Weekly and Daily: 90 Days	Period
Environment, Health & Safety	09305.0	Hazardous Materials (HAZMAT) Site Security Plans	Contains required hazardous materials plans at sites. Includes plans, risk assessments, worst case scenarios, and other records supporting implementation.	Location	After Superseded Or Outdated + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09055.0	Hazardous Materials Removal Project Management	Documents hazardous materials abatement projects. Includes project plans, drawings, training, licenses and registrations, description of operations and procedures followed, disposal site information, environmental testing, medical surveillance and exposure records for the project personnel, and related records.	Location	Medical Surveillance and Exposure Records: Move To “Medical Records” After Project Completed; Other Records: After Project Completed + 30 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09260.0	Incident Tracking	Documents recordable and other environmental and safety incidents. Includes date, type of incident, response, and incident investigation related records.	Corporate Environment, Health & Safety; Location	Recordable: 5 Years; Other Incidents: 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09065.0	Industrial Hygiene	Documents measures taken to monitor the workplace environment for hazardous substances or conditions, except for radiation exposure. Includes methodologies	Location	40 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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			used, sampling plans, summary of background data relevant to interpreting results obtained, laboratory reports and worksheets, and related records. Note: For records related to radiation exposure, see "Industrial Hygiene-Radiation".			Period
Environment, Health & Safety	09311.0	Industrial Hygiene - Radiation Protection	Documents measures taken to protect employees and contractors against radiation exposure. Includes protection program provisions, Nuclear Regulatory Commission (NRC) Forms 4 and 5, audits and reviews, surveys, samplings, calibrations, individual dose limits, and related records.	Location	Protection Audits, Reviews, Surveys, Samplings, Calibrations, Forms 4 & 5, and Supporting Records: 3 Years; Other Records: After License Terminated + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09110.0	Injury and Illness Reporting	Contains required federal, state, and local government reporting of on-the-job injuries and illnesses (such as those for the Occupational Safety & Health Administration (OSHA)). Includes reports, logs, privacy case lists, surveys, and annual summary forms. Note: Excludes drug testing, worker's compensation, and health and disability documentation.	Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09090.0	Licenses, Registrations, Accreditations and	Contains required licenses and accreditations for operations. Includes applications, licenses,	Location	After Expired + 3 Years	As Long As Needed For Business Purposes, But No

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		Certifications - Environment, Health & Safety	certifications, and related records.			Longer Than Official Version Retention Period
Environment, Health & Safety	09045.0	Material Safety Data Sheets (MSDS)	Documents a substance's physical and chemical properties, potential hazards when using, precautions to take, proper storage, clean up procedures, and other information. Includes chemical identity, ingredients, characteristics, hazardous properties, safe handling, and other information.	Location Using Hazardous Materials	After Superseded Or Outdated + 30 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09080.0	Medical Records	Documents medical treatment and assessment of employees and contractors. Includes complaints, injuries and illnesses, examinations, audiometric testing, hazardous substance exposure surveillance monitoring, diagnoses, test results, treatment, and related records.	On-Site Registered Nurse (RN) or Designee	Employee or Contractor Termination + 40 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09120.0	Pesticide Applications	Documents use of pesticides on company property. Includes applications, inspections, sampling notifications, and other records.	Location	2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09316.0	Safety and Health Program Management	Documents the management and administrative oversight of the company's employee safety and health programs, including bloodborne pathogens. Includes program development records,	Corporate Health & Safety; Location	After Superseded Or Outdated + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			regulatory compliance requirements, action plans, project oversight documentation, employee communications, and other related documentation.			
Environment, Health & Safety	09100.0	Safety Committee Meetings	Documents issues taken up by local safety committees. Includes member rosters, agendas, meeting minutes, exhibits, and related records.	Location	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09170.1	Safety Permits and Procedures	Contains safety permits, fit tests, and procedures to protect employees and contractors and to meet regulatory requirements for certain operations. Includes hot work and confined space entry permits, respiratory fit tests, and internal procedures such as line breaking, power line, man basket, jack hammer, trenching, and groundbreaking.	Location	Permits: After Expired + 1 Year; Fit Tests: Until Next Testing; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09326.0	Solid Waste and Hazardous Materials Storage Facilities	Documents processing, treatment, storage, and closure and post closure plans and cost estimates at solid waste treatment, landfill, and hazardous waste facilities. Includes applications, environmental statements, permits, reports, studies, site plans, groundwater monitoring, air emissions testing, inspections, certifications, closure plans, post-	Corporate Environment, Health & Safety, Location	Permits, Final Application, and Final Closure Records: Permanent; Testing and Inspections: 5 Years; Other Records: After Site Closed + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			closure cost estimates, and related records.			
Environment, Health & Safety	09190.0	Spills and Releases	Documents reporting and remediation activities for environmental spills and releases, other than those involving Superfund sites and storage tanks. Includes reports, analyses, studies, remediation plans, supporting documentation, and related records. <u>Note:</u> For records related to Superfund sites and storage tanks, see "Spills and Releases -Superfund Sites (Including State Equivalent)" and "Storage Tanks".	Location	After Remediation Completed + 5 Years, Or As Mandated By Permit, Agreement, Or Order	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09321.0	Spills and Releases - Superfund Sites (Including State Equivalent)	Documents activities at locations designated as a Superfund site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), or a State Equivalent. Includes environmental assessments, notification of hazardous waste site, record of decision, studies, analyses, reports, correspondence, expenses, CERCLA claims, closure documentation, and related records.	Location	After Site Closed + 50 Years, Unless Specified By Order Or Decree	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09200.0	Storage Tanks	Documents operations and maintenance of above and below ground storage tanks. Includes installation, calibration, piping protection, system inspections, tests, release detection, leak cleanup,	Location	Life of Tank + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			maintenance, repairs, closure, and related records.			
Environment, Health & Safety	09210.0	Toxic Substances Control	Documents production, use, and distribution of chemicals or mixture of chemicals as regulated by the Toxic Substance Control Act (TSCA). Includes chemical inventories, corrective actions, and related records.	Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09250.0	Waste Shipments	Documents receipt, shipment, or transfer of hazardous and non-hazardous waste. Includes shipping manifests, tickets, papers, and related records.	Location	Hazardous Waste Shipments: 5 Years; Other Shipments: 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09075.1	Workers Compensation Claims Management	Documents workers compensation claims filed against the company. Includes injury reports, investigations, board hearings, treatment, billing, denials, appeals, judgments, releases, and related settlement records.	Claims Administrator	Releases / Settlement Papers: 75 Years; Denied Claims: After Decision Made + 3 Years; Other Records: After Settled and Last Payment Issued + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Finance	02004.0	Accounting Policies & Interpretations	Documents accounting practices and principles used to determine appropriate treatment of company transactions. Includes notices, action plans, policy statements, and related records.	Corporate Accounting & Financial Reporting	All Tax Audits Completed and Policy Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02260.0	Accounts Payable	Documents company payments made for goods and services. Includes invoices, billings, payment requests, purchase orders, payment authorizations, employee travel and expense reporting, charitable contributions, procurement and company credit card statements, receipts for goods, journal entries, and related records supplying details to expense transactions.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02261.0	Accounts Receivable	Documents monies received for goods and services. Includes billings, receipts, journal entries, revenue statements, reconciliations, write-offs, recoveries, and related records.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02012.0	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Financial Analysis	Documents financial implications of a proposed company acquisition, merger, joint venture, or divestiture. Includes reports, analyses, supporting documentation, and related records.	Corporate Accounting & Financial Reporting; Planning & Analysis; Office Responsible for	All Tax Audits Completed and Ownership / Participation Terminated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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				Managing Due Diligence		
Finance	02008.0	Bank Account Administration	Documents administration of bank accounts. Includes agreements, correspondence, signature authorizations, and related relationship records.	Treasury	After Account Closed + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02262.0	Banking and Cash Management	Documents banking and cash management transactions. Includes statements, drafts, deposits, wire and other transfers, confirmations, credits, reconciliations, reports, and related records.	Treasury; Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02285.0	Corporate Consolidated Financials	Documents the consolidated financials to support the company's final Financial Statements. Includes individual financial statements by reporting locations, consolidation and performance reporting adjustments, and related records.	Corporate Accounting & Financial Reporting	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02013.0	Corporate Credit Cards	Documents issuance of procurement and travel and expense credit cards to employees. Includes applications, authorizations, account changes, and related records.	Finance Operations; Service Provider	After Account Closed + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02015.0	Customer Credit Accounts	Documents issuance of credit to customers. Includes account applications, references, credit	Credit; Controlling Office	All Tax Audits Completed and Account Closed	As Long As Needed For Business Purposes, But No

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			reports, copies of guarantees and promissory notes, correspondence, collections, payment plans, write-offs, and related records.			Longer Than Official Version Retention Period
Finance	02270.0	Customer Credit Card Transaction Form	Documents customer credit card transactions sent to Accounts Receivable. Includes name, account number, card expiration date, and related information.	Credit; Controlling Office	180 Days	None Permitted
Finance	02275.0	Debt Instruments and Management	Documents the borrowing, lending and management of loans, bonds, and other debt instruments. Includes agreements, bonds, mortgages, promissory notes, stock certificates, schedules, reports to lenders, payments, and related records.	Treasury; Controlling Office	All Tax Audits Completed and Debt Repaid	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02280.0	Debt Management - Intercompany Loans	Documents the management of intercompany loans. Includes agreements, amendments, schedules, reports, and related records.	Treasury; Controlling Office	All Tax Audits Completed and Debt Repaid	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02018.0	Derivatives and Other Treasury Transactions	Documents derivative and other treasury transactions entered into by the company such as currency swaps, stock repurchases, timber monetization, and bond buybacks. Includes foreign currency transaction details, hedge accounting documentation, valuation schedules,	Corporate Accounting & Financial Reporting	All Tax Audits Completed and Transaction Terminated, Expired, Or Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			confirmations, correspondence, workpapers, and other records.			
Finance	02021.0	Financial Analyses and Reporting	Documents sales, costs, and other financial conditions affecting the company used to support management decision-making. Includes reports, studies, forecasts, trends, plans, rating agency reviews, goodwill impairment valuations, and related records.	Corporate Accounting & Financial Reporting; Planning & Analysis; Local Accounting Office	Goodwill Impairment Evaluations: All Tax Audits Completed; Other Records: 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02019.0	Financial Audits – External	Contains financial audits performed by service providers. Includes audit reports, correspondence, and related records.	Corporate Accounting & Financial Reporting; Office Audited	7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02020.0	Financial Guarantees	Contains financial guarantees provided by the company. Includes letters of credit, "comfort letters", and related records.	Treasury	All Tax Audits Completed and Guarantee Expired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02029.0	Financial Internal Control Reporting	Contains key financial reports that are used to support audit verifications. Includes review and approval, and supporting documentation.	Department	Annual, Semi-Annual & Quarterly Reports: 1 Year; Monthly Reports: 6 Months; Daily & Weekly Reports: 3 Months	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Finance	02010.1	Financial Planning and Forecasting	Documents development and monitoring of annual company financial plan. Includes revenue and expenditure forecasts, variances, budget plans, workpapers, monitoring reports, allocations, and related records.	Controlling Office	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02022.0	Financial Statements	Contains official annual and quarterly reports documenting the general financial condition and operation of the company. Includes valuations, costs, expenses, explanatory statements, and related information. Note: Quarterly statements are summarized in the annual statement which is prepared and signed by the company's outside auditor.	Corporate Accounting & Financial Reporting; Tax; Office Preparing Statement	Annual Statement: Permanent; Other Records: 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02024.0	Fixed Assets	Contains records used to track company fixed assets, including real estate, buildings, equipment, vehicles, and other similar fixed assets. Includes asset registers, depreciation schedules, amortization, valuations, appraisals, property acquisition and disposal, transfers, and related records.	Global Financial Services; Office Responsible for Asset Accounting	All Tax Audits Completed and Asset Depreciated & Disposed Of	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02263.0	General Ledger	Documents general ledger transactions. Includes account reconciliation, balance sheet reporting, chart of accounts, journal entries, validations, inventory	Office Responsible for Processing or Reconciling Transactions	Final General Ledger For Year: Permanent; Other Records: All Tax Audits	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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			calculations, and related records used for final accounting of annual business activities.		Completed	Period
Finance	02052.0	Imputed Income	Documents tax liability associated with an employee's commute, personal travel, or use of other company property. Includes documentation, calculations, determination, and related records.	Human Resources Service Center; Office Responsible for Calculation	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02026.0	Insurance Coverage	Documents company insurance coverage for general liability, casualty, worker compensation, fire, vehicle, flood, travel, environmental, and other areas. Includes policies, bonds, certificates, riders, premiums paid, loss summaries, correspondence, and related records.	Global Risk Management; Office Securing Policy	Casualty and Liability Policies, Bonds, and Certificates (Including Environmental and Hazardous Materials Coverage): Permanent; Other Policies, Bonds, and Certificates: After Expired + 10 Years; Other Records: All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02027.0	Intellectual Property - Royalties	Documents the receipt of royalties from license agreements. Includes agreements, payments, correspondence, and related records.	Legal	All Tax Audits Completed and Agreement Expired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Finance	02264.0	Intercompany Accounting	Documents intercompany transactions. Includes account transfers, reconciliations, invoices, transmittals, journal vouchers, journal entries, and related records.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02056.0	Internal Control Documentation	Documents review of company financial statements and mechanisms used to prevent and detect fraud. Includes reports, QR 16 representation letters, SAS 70 testing results, internal control tracking, correspondence, and related records.	Department	7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02030.0	Investment Performance - Money Market Management	Documents the management of company-owned, short-term money market investment funds. Includes statements, confirmations, correspondence, and related records.	Treasury	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02031.0	Investment Performance - Retirement Fund Reporting	Documents the performance of investments used to fund the company's retirement programs. Includes reports created by service providers, fund names, gains and losses, and related information.	Trust Investments	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02049.0	Manufacturing Costs	Documents costs of manufacturing products. Includes standard costs and variances, reports, studies, workpapers, calculations, cost determinations, raw materials, finished goods, and related records.	Office Responsible for Cost Determination	Standard Costs: All Tax Audits Completed; Other Records: No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Finance	02265.0	Payroll	Documents amount received and deductions taken from employee's pay. Includes master payroll report, vouchers, reconciliations, and related records.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02051.0	Regulatory Compliance - Financial Control Plans	Documents compliance with regulatory control plans, such as those for the Internal Revenue Service (IRS). Includes process designs, control matrixes, testing plans, and related records.	Finance; Information Technology	After Superseded Or Outdated + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02035.0	Regulatory Reporting - Financial Certifications	Contains annual statements issued by the Chief Executive Officer (CEO) and Chief Financial Officer (CFO) certifying the company's financial statements and related disclosures. Includes sub-certifications.	Legal; Financial Policy and Control	After Filed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02115.0	Regulatory Reporting - Securities & Exchange Commission (SEC) Filings	Contains annual and quarterly Securities & Exchange Commission (SEC) filings such as 8-K, 10-K, 10-Q, and Form 5, eXtensible Business Reporting Language (XBRL) reporting, and other required filings. Includes filings and supporting documentation.	Corporate Secretary; Corporate Accounting & Financial Reporting	Filings: Permanent; Other Records: After Filed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02032.0	Risk Management - Locations	Documents measures taken at locations to mitigate insurance risks. Includes copies of engineering drawings, site inspections, reports,	Global Risk Management	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official

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			and related records.			Version Retention Period
Finance	02037.0	State Sales Tax Exemption Certificates	Documents exemption to a buyer or a seller from paying state sales tax on the specified item.	Location	All Tax Audits Completed and Certificate Expired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02009.0	Surety Bonds	Contains contract and commercial surety bonds for products and services. Includes performance, court, license and permit, and miscellaneous bonds, correspondence, and related records.	Global Risk Management	Contract Obligations Cease + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02040.0	Tax Audit Files	Documents audits done on federal, state, and local tax returns. Includes copy of return and workpapers, documentation requests, responses, copies of records submitted, correspondence, settlement, closing agreements, and related records.	Tax	All Tax Audits Settled + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02290.0	Tax Basis Files	Documents company's tax basis in subsidiaries, partnerships, joint ventures, and other investments. Includes workpapers and supporting documentation.	Tax	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02041.0	Tax Filings - Returns and Workpapers	Documents preparation and submission of company tax returns, including income, sales and use taxes, excise, property, franchise, payroll,	Office Submitting Filing	Income Tax Returns: 75 Years; Other Records: After Tax Audit Settled +	As Long As Needed For Business Purposes, But No Longer Than Official

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			and others with federal, state, and local taxing authorities. Includes submitted returns, workpapers, adjustments, credits, disclosures, exemptions, and supporting records.		10 Years	Version Retention Period
Finance	02042.0	Tax History Files	Documents positions taken on tax filings. Includes determination letters, Internal Revenue Service (IRS) agent reports, copy of closing agreements, rulings, legal opinions, court orders, and related records.	Tax	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02043.0	Tax Identification Certification - W-9s	Documents tax-related information received from service providers in order to prepare required 1099 forms.	Global Sourcing; Finance; Location	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02044.0	Tax Withholding Forms	Documents wages paid and taxes withheld that were reported to taxing authorities. Includes Forms 1099, W-2, 941, and other required state and federal forms.	Finance Operations; Human Resources Service Center	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02046.0	Unclaimed Property Reporting	Documents unclaimed and escheated property reported to states. Includes reports and supporting documentation.	Corporate Accounting & Financial Reporting	25 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period



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Human Resources	03001.0	Affirmative Action Plans	Contains company and location-specific affirmative action plans. Includes plans, reports, audits, and supporting records.	Diversity & Compliance; Location	After Plan Issued + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03418.0	Benefit Claims	Documents claims submitted for medical, retirement, and other company benefits. Includes eligibility, calculations, determination, escalations, decisions, appeals, payments, and related records.	Claims Administrators	After Claim Resolved + 7 Years and All Payouts Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03006.0	Benefit Claims Reporting	Documents claims paid under company benefit plans. Includes reports from claims administrators and claims data used for historical trending.	Global Compensation & Benefits	Claims Data: 10 Years; Reports: 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03008.1	Benefit Plans - Administration	Contains records documenting the administration of the company's benefit plans. Includes claims administrator agreements and amendments, rate structure determinations, actuarial valuations, calculations, funding support, and other related records.	Global Compensation & Benefits	Agreements and Amendments: Contract Obligations Cease + 6 Years; Other Records: 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03417.0	Benefit Plans - Enrollments and Elections	Documents annual participation in company benefit plans. Includes enrollments, elections, beneficiary and change forms, and related data.	Human Resources Service Centers; Location	After Superseded + 6 Years Or Plan Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official

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						Version Retention Period
Human Resources	03210.0	Benefit Plans - Governance and Reporting	Contains finalized benefit plans and records documenting governance for medical, pension, insurance, savings, and other company benefits, including those of legacy plans and programs obtained through acquisitions and mergers. Includes plans, amendments and revisions, summary plan descriptions, non-discrimination testing, Form 5500 and other Employee Retirement Income Security Account (ERISA) filings, summary annual report (SAR) to participants, Internal Revenue Service (IRS) fringe benefit filings, and working papers.	Global Compensation & Benefits; Benefits Accounting; Legal	Workpapers: After Plan Finalized + 3 Years; Other Records: Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03012.0	Compensation Plans - Awards	Contains records used to formulate specific payouts to employees and retired executives under the Performance Share Plan (PSP), Management Incentive Plan (MIP), Supplemental Executive Retirement Plan (SERP), and the merit award, gainsharing, bonus, stock option, and commission programs. Includes awards, payouts, stock option grants, calculations and other workpapers, correspondence, and records of legacy plans and programs obtained through	Human Resources Manager; Global Compensation & Benefits	All Tax Audits Completed and Final Payout + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			acquisitions and mergers.			
Human Resources	03011.0	Compensation Plans - Development	Documents development of annual compensation plans and programs for hourly, salaried, commission, and executive employees. Includes policies, guidelines, salary structure data, and other records.	Global Compensation & Benefits	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03015.0	Disability and Medical Leaves	Documents application for and decision made to grant an employee leave, including short term (STD) and long term disability (LTD), sickness and accident (S&A), and leaves under the Family Medical and Leave Act (FMLA). Includes forms, correspondence, determination, and related records.	Human Resources Service Center	After Decision Made Or Leave Completed, Whichever Is Longer + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03016.0	Drug Testing	Documents drug testing for job applicants and company employees. Includes chain of custody forms, test results, and related records.	Human Resources Manager; Employee Service Center	Positive Employee Results: 10 Years; Positive Applicant Results: 3 Years; Negative Results: 1 Year	None Permitted
Human Resources	03017.0	Employee Issues	Documents non-legal issues brought by or concerning company employees, such as complaints or internal disciplinary matters. Includes correspondence, investigation notes, reports, findings, and determinations.	Human Resources Manager; Supervisor	After Resolved + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03035.0	Employee Relocation	Documents process for relocating employees. Includes approval forms, invoices and other expense	Human Resources Operations	All Tax Audits Completed + 7 Years	As Long As Needed For Business Purposes, But No

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			documentation, agreements, correspondence, tax equalization information, policy exceptions, and related records.			Longer Than Official Version Retention Period
Human Resources	03019.1	Employment Eligibility Verifications	Documents employee eligibility to work within the United States. Includes Form I-9, H-IB visa documentation, green card labor applications and notifications, TN and L-1A visa immigration and naturalization forms, correspondence, and related records.	Human Resources Manager; Employee Service Center	Employee Termination + 3 Years	None Permitted
Human Resources	03020.0	Grievances	Documents formal complaint and proceedings brought by an employee concerning alleged violation of collective bargaining or legal employment rights. Includes complaint, investigation, mediation, arbitration, determination, appeal, and related records.	Location	Labor Union Grievances: After Settled + 10 Years; Other Grievances: After Settled + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03402.0	Job Catalog	Documents approved positions within the company. Includes position number, name, and description.	Global Compensation & Benefits	After Superseded	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03205.0	Labor Relations - Bids and Awards	Documents union bid and award process for covered positions. Includes seniority rosters, bids, awards, and related records.	Human Resource Manager; Location	Seniority Rosters: After Superseded + 2 Years; Other Records: After	As Long As Needed For Business Purposes, But No Longer Than Official

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					Position Awarded + 2 Years	Version Retention Period
Human Resources	03024.0	Labor Relations - Collective Bargaining Campaigns	Documents strategy adopted during collective bargaining agreement campaigns. Includes worksheets, cost analyses, campaign materials, presentations, correspondence, benefits offerings such as health & welfare, and related records.	Employee Relations	Contract Obligations Cease + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03025.0	Labor Relations - Collective Bargaining Negotiations	Documents negotiations over collective bargaining agreements. Includes correspondence, meeting minutes, analyses of issues, position statements, benefit cost information, draft agreement language, and related records. Note: For official union agreements, see "Contracts and Agreements - Collective Bargaining".	Employee Relations; Location	Contract Obligations Cease + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03045.0	Labor Relations - Union Employee Notices	Documents mandatory work-related notices given to union employees per their union agreement. Includes facility shutdowns and other events affecting their work environment.	Location	Until Contract Obligations Cease Unless Retention Specified Per The Agreement	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03920.0	Manager's Employee Desk File	Documents manager's discussions with employees during one on ones, career development or disciplinary actions. Includes notes and other related records to assist manager in performance reviews and career	Department	No Longer Than Termination Or Transfer + 1 Year	None Permitted

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			discussions. Note: Any employee records that are deemed to be part of the "Official Employee Record" should be sent to the Human Resources Manager for inclusion in the employee's "Official Employee Record"			
Human Resources	03030.0	Official Employee Record	Documents employee history with the company. Includes application, offer letter and hiring documents, employment contracts and agreements, personnel change notices, compensation history, certifications, awards, letters of commendation, skills testing results, performance evaluations, termination checklists and releases, and related records. Note: For a complete listing of records considered to be part of the "Official Employee Record", see Human Resources Policy 405 - Employee Records Management.	Human Resources Manager; Global Compensation & Benefits	Employee Termination + 10 Years and Contract Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03029.1	Payroll Deductions	Documents authorizations and court ordered withholdings for payroll deductions. Includes direct deposit, tax withholdings, loans, promissory notes, child support levies, garnishments and liens, authorization forms, status changes, W-4s, and related records.	Human Resources Service Center; Location	Loans, Liens, and Garnishments: Final Payment + 7 Years; Other Records: After Authorization Superseded / Employee Termination + 4 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Human Resources	03220.0	Personnel Strategy Planning	Contains people reviews, succession planning and related records.	Human Resources; Department	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03401.0	Position Descriptions	Contains description of positions. Includes requirements, responsibilities, duties, and other details on positions.	Human Resources; Compensation; Department Issuing Job Description	After Superseded / Position Abolished + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03033.0	Recruitment Program	Documents efforts made to advertise and recruit for open positions. Includes job postings, advertisements, diversity outreach letters, correspondence, and related records.	Human Resources Manager	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03414.0	Recruitment Program - Background Checks	Contains reference, credit, and other background checks. Includes reports, notes, correspondence, and related records.	Human Resources Manager	3 Years	None Permitted
Human Resources	03413.0	Recruitment Program - Hiring and Selection	Documents employee hiring and selection process for open positions. Includes applications, resumes, testing materials, interview logs, and related records.	Human Resources Manager	Records For Successful Candidate: Move To "Official Employee Record"; Records For Other Applicants: After Decision Made + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Human Resources	03034.0	Regulatory Reporting - Equal Employment Opportunity Commission (EEOC)	Documents required reporting to the Equal Employment Opportunity Commission (EEOC). Includes EEO-1 and VETS-100 reports.	Diversity & Compliance; Location	After Report Issued + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03038.0	Time Reporting	Documents employee time reporting. Includes time sheets, time tickets, and other records detailing hours worked. Note: For time sheets and related records for temporary employees, contractors, consultants, and other service providers, see "Accounts Payable".	Human Resources Service Center; Entry Location	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03026.0	Training - Management Development Program	Documents development of courses used to train employees on management and leadership skills. Includes manuals, guides, employee interviews, instructional content, and related records.	Staffing & Development	After Superseded / No Longer Used + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03938.0	Training - Non Regulated	Documents company training not mandated by law or regulation. Includes training schedules, attendance sheets, course materials, and related records.	Office(s) Responsible for Development / Delivery and / or Attendance Tracking	Course Materials: After Superseded Or Outdated + 3 Years; Other Records: 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03040.0	Training - Regulated	Documents company training mandated by law or regulation, such as antitrust, safety, equipment operation, hazardous materials	Office(s) Responsible for Development / Delivery and / or	Certificates Of Completion: Employee Termination + 6	As Long As Needed For Business Purposes, But No Longer Than Official

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			handling, and others. Includes training schedules, attendance sheets, course materials, certificates of completion, and related records.	Attendance Tracking	Years; Course Materials: After Superseded Or Outdated + 6 Years; Other Records: 6 Years	Version Retention Period

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Information Technology	05100.0	Asset Management - Information Technology Equipment	Documents life cycle of computer and other information technology equipment. Includes make, model, serial number, location, and other information.	Information Technology	After Equipment Disposed Of + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05030.0	Computer System Application Documentation	Documents purchase or in-house creation of applications, including implementation and removal / disposal of computer software from company systems. Includes purchasing, installation, software keys, source code / program listing, application design documentation, job control language, upgrades, modifications, removals / disposition, and other related records.	Information Technology	Financial Applications Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Data Is Migrated Or Purged and Documentation Is No Longer Relevant To Existing Data, Or The Application Is Permanently Retired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05009.0	Hardware Documentation	Documents purchase, implementation, and disposal of computer hardware used in company systems. Includes warranties, operating manuals and documentation, installation configurations into system architecture, inspection, maintenance, repair, disposition, and other related records.	Information Technology	Architecture, Configurations, and Documentation For Systems Supporting Tax Audits: All Tax Audits Completed; Other Records: After Hardware Disposed Of + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05010.1	Information Technology	Documents hardware and software standards and related processes used	Information Technology	Until Superseded Or Outdated	As Long As Needed For Business

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		Standards and Processes	by the company. Includes quality assurance, design, review, support, process flow diagrams, and other related records.			Purposes, But No Longer Than Official Version Retention Period
Information Technology	05008.0	Internet Domain Names and Addresses	Documents the management of the company's domain names and addresses. Includes names, addresses, host servers, registrations, renewals, and other related records.	Information Technology	After Registration Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05905.0	Project Management - Information Systems	Contains all project management documentation supporting a new application or enhancements to an existing application. Includes project delivery process (PDP) documentation, business requirements and analysis, project plans, work plans, change requests, and other related records.	Project Manager	Financial Programs Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Data Is Migrated Or Purged and Documentation Is No Longer Relevant To Existing Data, Or The Application Is Permanently Retired.	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05014.0	Software Management and Licensing	Documents the use of software in the company (such as those on the desktop, enterprise, server, third party tools, and mobile applications) to ensure system compatibility and compliance with license and copyright provisions. Includes software evaluations, compatibility	Information Technology; Location	Financial Programs Holding Information Needed For Open Tax Audits: All Tax Audits Completed and License Expired + 6 Years / Application No	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			testing, software licenses, site licenses, and other related records.		Longer Used ; Other Records: License Expired + 6 Years / Application No Longer Used	
Information Technology	05015.0	System Monitoring Activities	Documents electronic files or automated logs created to monitor computer system activities. Includes operations, applications and database logs (such as internet usage or error logs), and other related records.	Information Technology; Office Monitoring Activity	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05016.0	System Table Maintenance	Documents the additions, deletions and changes of items in system tables.	Office Responsible for Table Maintenance	Master Data Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05001.0	System User Access	Documents access provided to users. Includes security login information, name, user ID, date, system, and other related information.	Information Technology; Office Controlling Access	Network User Id: 99 Years; Other Records: Until Deleted Or Outdated	None Permitted

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Legal	01039.0	Acquisitions and Sales - Real Property	Documents real estate acquisitions and sales. Includes abstracts, agreements, closing statements, deeds, easements, liens, promissory notes, mortgage documents, loan financing documents, amendments, addendums, notices of commencement, partitions, surveys, title insurance, transfers, sales, and other records documenting ownership or use.	Legal; IP Realty	Closing & Title Documents: Permanent; Abandoned Acquisitions / Sales Transactions: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01001.0	Advice and Counsel	Documents advice and counsel given by the Legal Department on matters affecting the company. Includes correspondence and supporting records.	Legal	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01058.0	Antitrust Oversight and Control	Documents antitrust oversight and control activities. Includes reports, studies, competitor contacts, correspondence, findings, actions taken, and related records.	Legal	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01005.0	Business and Product Development Legal Oversight	Documents oversight of business and product development activities. Includes copies of sales and marketing analyses, market research, industry information, development information, marketing collateral, sales materials, and related records.	Legal	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Legal	01017.0	Compliance Program Development and Maintenance	Documents compliance program activities. Includes program goals and objectives, responsibility statements, certifications, and related records.	Office Responsible for Design, Implementation and / or Enforcement	Certifications: Until Superseded Or Outdated + 6 Years; Other Records: After Program Terminated + 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01055.0	Conflict of Interest Waivers	Documents waivers granted by the company to outside counsel. Includes waivers, correspondence, and related records.	Legal	After Waiver Terminated + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01066.0	Contracts and Agreements	Contains agreements and contracts other than those specified in other areas of the Master Records Retention Schedule. Includes leases, renewals, amendments, change orders, correspondence, and other supporting records. Note: For employee related contracts and agreements, see "Official Employee Record".	Office Controlling Contractual Relationship	Environmental Or Hazardous Materials Remediation, Storage, Clean-Up, Or Other Services: Contract Obligations Cease + 50 Years; Other Records: Applicable Tax Audits Completed and Contract Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01067.0	Contracts and Agreements - Collective Bargaining	Documents agreements with labor unions as part of the collective bargaining process.	Human Resources Manager	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Legal	01012.0	Contracts and Agreements - Improvements to Real Property	Contains contracts and agreements for design, construction, renovation, and improvements to company buildings and real estate. Includes contracts, agreements, renewals, amendments, correspondence, and supporting records.	Office Managing the Property	All Tax Audits Completed and Assets Depreciated & Disposed Of	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01023.0	Foreign Trade Barrier Matters	Documents trade barriers and other restrictions on international sales or exports. Includes language of barrier / regulation, reports, analyses, opinions, correspondence, and related records.	Legal	After Barrier / Requirement Removed + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01200.0	Helpline Cases	Documents complaints or issues received by the Helpline. Includes complainant's allegations, call notes, investigation, resolution, and related records. Note: This includes records and other data pertaining to breaches in security or allegations of fraud at company locations.	Ethics Office; Office Responsible for Investigation or Resolution	After Resolved + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01024.1	Insurance Claims	Documents liability and non-liability claims for reported incidents under the company's insurance policies. Includes loss reports and supporting records.	Legal; Global Risk Management	After Settled + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01061.0	Intellectual Property - Abandoned Trademark	Documents abandoned registration of trademarks. Includes correspondence, opinions, applications, searches, and	Legal	Application Abandoned + 6 Years	As Long As Needed For Business Purposes, But No

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		Applications	related records.			Longer Than Official Version Retention Period
Legal	01063.0	Intellectual Property - Clearance Searches and Opinions	Documents searches and analysis of intellectual property rights of others in relation to company's activities, products, and processes. Includes correspondence, opinions, searches, and other related records.	Legal	Life Of Intellectual Property Rights + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01062.0	Intellectual Property - Common Law Trademarks	Documents company's use of its common law trademarks. Includes searches and other related records.	Legal	Date Trademark Use Discontinued + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01027.0	Intellectual Property - Copyrights	Contains copyright applications and registrations. Includes correspondence, searches, and other related records.	Legal	After Copyright Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01029.0	Intellectual Property - Patents	Documents patent filings and related administrative proceedings such as oppositions, re-examinations or interferences. Includes applications, fee transmittals, specifications, correspondence, opinions, oaths, declarations, and related records.	Legal	After Patent Application Abandoned, Or Last Foreign Or U.S. Counterpart Lapsed Or Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Legal	01030.0	Intellectual Property - Registered Trademarks	Documents registering of company trademarks. Includes registrations, filings, certifications, specimens, renewals, and supporting records.	Legal	Life of Registration and / or Registration Cancelled + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01064.0	Intellectual Property - Trademark Searches	Documents trademark searches conducted. Includes search records, specimens, and right-to-use opinions.	Legal	After Search Completed + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01065.0	Intellectual Property - Unfiled Records of Inventions	Documents records of inventions that have not been filed. Includes correspondence, opinions, searches, and related records.	Legal	200 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01032.0	Legal Proceedings	Documents litigation and claims other than those specified in other areas of the Master Records Retention Schedule. Includes notices, statements, pleadings, judgments, opinions, and related records. Note: For the release and / or settlement agreement, see "Releases and Settlements".	Legal (Managing Attorney)	After Resolved Or No Activity + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01072.0	Legal Proceedings - Asbestos	Contains records related to asbestos litigation and claim cases.	Legal (Managing Attorney)	Permanent	As Long As Needed For Business Purposes, But No

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						Longer Than Official Version Retention Period
Legal	01033.0	Legal Proceedings - Attachments and Garnishments	Contains court orders, change orders, withholding support for employee attachments and garnishments.	Legal	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01073.0	Legal Proceedings - Remediation	Documents remediation related to Comprehensive Environmental Response Compensation and Liability Act (CERCLA / Superfund), Resource Conservation and Recovery Act (RCRA), or other remediation and state equivalent regulations. Includes settlement agreements and other related records.	Legal (Managing Attorney)	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01070.0	Legal Proceedings - Service of Process	Contains summonses or other documents issued by a court or administrative agency served on the company or its registered agent for service of process.	Legal	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01059.0	Legal Proceedings - Third Party Subpoenas & Other Information Requests	Documents orders, subpoenas, and other requests received from third parties. Includes order, subpoena, response, correspondence, and related records.	Legal	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Legal	01056.0	Licenses, Registrations and Certifications – Federal Communications Commission (FCC)	Contains license applications, registrations and certifications approved by the Federal Communications Commission (FCC).	Office Managing the License	Duration of License	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01008.0	Policies Acknowledgements	Contains forms signed by company employees documenting their acknowledgement and / or agreement to abide by various company policies or standards of behavior.	Office Controlling Process	Until Superseded Or Outdated + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01038.0	Political Action Committee Filings	Documents activities of the company's Political Action Committee (PAC). Includes registration, reporting, and related records.	Government Relations	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01075.0	Product Liability Warranty Claims	Documents warranty claims received on the company's products. Includes claim, investigation, and related records. Note: For the release and / or settlement agreement, see "Releases and Settlements".	Legal	Masonite Claims: Warranty Period Or No Longer Than After Settled + 18 Years; Other Claims: After Settled or Released + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01205.0	Regulatory Audits - External	Documents external audits, examinations, and reviews from regulatory authorities such as the Securities and Exchange Commission (SEC), Department of Energy (DOE),	Legal	No Longer Than After Completed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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			Department of Transportation (DOT), Office of Federal Contract Compliance Programs (OFCCP), Environmental Protection Agency (EPA), Occupational Safety & Health Administration (OSHA), and other regulatory agencies. Includes questionnaires received from auditors, responses to auditors, action plans if applicable, and related records.			Period
Legal	01041.0	Regulatory Communications	Documents communications with regulators on various compliance matters. Includes inquiries from regulators, the company's responses, and supporting documentation.	Office Communicating with Regulator	Non-Time Limited Regulatory Settlements, Obligations and / or Undertakings: Permanent; Other Records: After Superseded + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01042.0	Regulatory Reporting	Documents regulatory reporting other than those specified in other areas of the Master Records Retention Schedule (such as Medicare Reporting). Includes workpapers, data files, and related records.	Office Responsible for Submission	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01069.0	Releases and Settlements	Contains releases and settlements, other than those specified in other areas of the Master Records Retention Schedule, that document the release of the company from future	Legal	75 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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			obligations and / or terms to settle a legal matter.			Period
Legal	01057.0	Right of Ways and Easements	Documents the legal rights enabling the company or another entity to transport goods over a particular land or property. Includes easements, agreements, right-of-ways, correspondence, and related records.	Global Supply Chain	After Revoked or Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01068.0	Transportation Claims - Loss / Damage	Documents transportation and loss damage claims. Includes findings, damaged load information, correspondence, credits, adjustments, write-offs, and related records.	Global Supply Chain	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01074.0	Vehicle Titles	Contains forms issued by the states' Department of Motor Vehicles (DMV) establishing the company as the legal owner of a vehicle. Includes related records. Note: For registration records, see "Vehicle Records".	Vehicle Location	Until Vehicle Disposed Of Or Sold	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Operations	08103.0	Aircraft Operations and Maintenance	Documents the management of company aircraft. Includes titles, registrations, logbooks, aircraft engine records, inspections, maintenance records, incident reports, flight plans, and related records.	Aviation	After Aircraft Disposed Of + 1 Year Or Transfer To New Owner	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08104.0	Bids and Proposals	Documents bids issued by the company for products and services and responses received. Includes bids, Requests for Information (RFI) / Requests for Proposals (RFP) issued, responses, evaluations, correspondence, and related records.	Global Supply Chain; Office Responsible for Bid Process	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08125.0	Bills of Lading	Documents delivery of materials and products within the United States. Includes date, transporter, contents, destination, and related information. Note: For international destinations, see "Import / Export Control".	Shipping Location	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08130.0	Building and Grounds Maintenance	Documents janitorial, grounds keeping, and other facility work performed on company properties. Includes work orders, statement of repairs or work completed, and related records.	Location	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08230.0	Business Continuity	Documents business continuity and disaster planning. Includes actual plans, testing, and other related records.	Location or Department	Until Superseded	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Operations	08113.0	Business Planning	Contains business plans for operations. Includes strategy, sales, marketing, staffing, and related records.	Office Preparing the Plan	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08105.0	Certificates of Insurance - Contractors	Contains certificates of insurance for the parties retained to provide contracted services. Includes coverage in effect, dates of inception and expiration, limits, and named insured.	Office Controlling Contractual Relationship	Life Of Relationship With Contractor + 20 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08106.0	Contract and Lease Management	Documents the management of the terms and conditions of the company's contracts and leases for services, equipment, and real property. Includes copies of contracts / agreements, reports, correspondence, and other related records.	Global Supply Chain; Office Managing Lease	Contract Obligations Cease + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08001.0	Crop Management	Documents the planning, planting, monitoring and harvesting of trees in the company's research plots. Includes data measurements, analyses, and other related records.	Location	No Longer Than After Harvest + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08107.0	Distribution Warehouse Management	Documents administrative oversight of the operations at the warehouses used to receive and ship company products.	Global Supply Chain	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Operations	08110.1	Driver and Vehicle Inspections	Contains required Department of Transportation (DOT) inspections and remedial actions taken. Includes commercial driver's inspections of vehicle and roadside inspections.	Vehicle Location	Roadside Inspections: 1 Year; Driver's Inspections: 3 Months	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08108.0	Driver Logs	Documents commercial driver's hours of service for Department of Transportation (DOT) reporting. Includes driver's logs that contain the name of the driver, dates, times, locations, and related information.	Vehicle Location	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08109.0	Driver Qualification Records	Documents drivers' ability or qualifications to drive a commercial motor vehicle.	Vehicle Location	Employee Termination + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08128.0	Equipment Maintenance	Documents repair and maintenance of equipment owned or leased by the company. Includes routine maintenance, preventive maintenance, scheduling, repairs, calibrations, inspections, analysis reports, logs, and other related records.	Location	Maintenance, Inspections, and Repair Records: Life Of Equipment + 10 Years; Analysis Reports and Logs: No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08003.0	Facility and Equipment Plans and Drawings	Documents design of company facilities and equipment. Includes plans and drawings, specifications, schematics, and other related records.	Project Manager	Facilities: After Sold, Ownership Transferred, Or Demolished + 6	As Long As Needed For Business Purposes, But No Longer Than Official

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					Years; Equipment: After Disposition + 6 Years	Version Retention Period
Operations	08005.0	Facility Plan	Documents planned changes in technology, equipment, or space to meet the long-range needs of the facility or operation.	Location	Until Outdated + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08126.0	Import / Export Control	Contains required import / export documentation. Includes applications, authorizations, inventories, correspondence, and related records.	Shipping and / or Receiving Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08240.0	Internal Audits	Documents internal audits performed on company operations, other than those specified in other areas of the Master Records Retention Schedule. Includes reports, testing, peer reviews, self assessments, and related records.	Department Performing Audit	Financial Audits: 7 Years; Other Audits: Until Superseded or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08114.0	Inventory Reconciliation	Documents amount of goods, materials, equipment and other company property. Includes inventory reports, cycle counts, reconciliations, and related records.	Office Managing Inventory	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08006.0	Lot Samples	Contains specimens and samples used to test the quality of the company's products during production.	Location Conducting Test	No Longer Than 1 Year	As Long As Needed For Business Purposes, But No

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						Longer Than Official Version Retention Period
Operations	08115.0	Materials and Supplies Management	Documents requisition, receipt, consumption, and distribution of materials from company storerooms and locations. Includes requisitions, transfers, inventories, tallies, scale tickets, scrap tickets, weights, and related records.	Office Managing Materials and / or Supplies	4 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08250.0	Pilot Qualification Records	Documents pilot's qualification to fly an aircraft. Includes records required by the Federal Aviation Administration (FAA) such as proficiency checks, training, certifications, and related records.	Aviation	Employee Termination + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08220.0	Product Stewardship and Certification	Documents information provided to customers on annual certification of products and chemical constituents. Includes test results, life cycle assessments, certificates, approvals, attestations, and related records.	Sustainability	Test Results, Assessments, Certifications, Attestations, and Approvals: After Superseded Or Outdated, + 6 Years; Other Records: 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08127.0	Production Management	Documents production activities for management purposes. Includes plans, schedules, downtime reporting, trim sheets, production orders, and other related records.	Production Location; Planner	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Operations	08906.0	Project Management - Capital Projects	Documents capital improvement and renovation projects. Includes plans, drawings, studies, analyses, reports, approvals, cost estimates, project workpapers, copies of purchase orders and other accounts payable documentation, payments, and related records.	Project Manager	Completed Projects: All Tax Audits Completed and Sold Or Disposed Of; Abandoned Projects: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08924.0	Project Management - Process Improvement Projects	Documents operational or productivity improvements. Includes the project plans, meeting minutes, deliverables, and other related records.	Project Manager	No Longer Than After Project Completed + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08009.0	Quality Audits	Contains reports and documentation related to the audits of the company's quality assurance processes and systems.	Location Audited	7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08010.0	Quality Certification	Documents measures taken by a plant to meet the quality requirements determined by the International Organization for Standardization (ISO) or other external standards organizations.	Location	Life of Certification + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08011.0	Quality Control	Documents quality controls used on company products. Includes material and process assessments, tests, quality audits, certificates of analysis (COA), and related records.	Location Conducting Test	After Warranty Period Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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						Period
Operations	08129.0	Railroad Records	Contains inspections, test and repair records, dispatch records, and hours of service records.	Operating Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08012.0	Right of Entry Permits and Licenses	Documents permission given to the public and others to access company property for social or recreational purposes. Includes applications, licenses and permits issued, and supporting records.	Office Issuing Permit	After Expired + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08225.0	Sustainable Forestry Initiatives and Chain of Custody Management	Documents activities to meet the Sustainable Forestry Initiative, ISO 14001, and other product stewardship certifications and standards. Includes certifications, audits, monitoring, and related records.	Sustainability	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08120.0	Transportation Carriers Management	Contains rate schedules, performance reviews, and other records used to manage the relationship with the company's transportation carriers.	Office Managing Relationship	No Longer Than Life Of Relationship + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08121.0	Transportation Planning & Coordination	Contains data and records used to plan and coordinate the movement of products via truck, parcel, rail, and ocean shipments.	Global Supply Chain	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period



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Operations	08123.0	Vehicle Records	Contains registration, maintenance, inspections, and repair records of the company-controlled motor vehicles. Includes dispatcher's logs, registers, gasoline logs, and other related records.	Vehicle Location	Registrations: After Expired + 3 Years; Other Records: 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Sales & Marketing	04403.0	Competitive Intelligence	Documents intelligence gathered on competitors providing similar products and services. Includes reports, studies, analyses, trends, forecasts, and related records.	Marketing	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04405.0	Corporate Brand Management	Documents the development and usage of the names, signs or symbols that uniquely identify the company's products and services.	Marketing	After Last Use + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04505.0	Customer Accounts Management	Documents customer-specific product requirements. Includes specifications, sample requests, technical records, job bags, and related information.	Sales; Technology	No Longer Than Life Of Relationship + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04404.0	Customer Complaints	Contains customer complaints concerning company products and services. Includes complaints, company responses, and other related records.	Office Resolving the Complaint	External Consumer Products Complaints: After Resolved + 4 Years; Other Complaints: After Resolved + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04407.0	Market Research	Documents market research done on products, services, and customers. Includes reports, studies, analyses, surveys, and related records.	Marketing	Until Superseded Or Outdated + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Sales & Marketing	04500.0	Marketing and Advertising	Documents marketing campaigns and advertising of company products and services. Includes campaign development, reports, requests, studies, job files and jackets with specifications, advertisements, marketing collateral, surveys, and related records.	Marketing	After Last Use + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04411.0	Pricing	Documents development of general and customer-specific pricing for products and services. Includes price surveys, price lists, price rules, price models, price deviation approvals, and related records.	Office Responsible for Setting Prices	Until Superseded Or Outdated + 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04412.0	Product Development and Management	Documents development of product and service lines. Includes concepts, ideas, analyses, specifications, change authorizations, information sheets, implementation planning, commercialization rollouts, and related records.	Marketing; Technology	Life Of Product Line + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04413.0	Prospect Management	Contains identification and qualification of prospective customers for company goods and services.	Office Managing Leads	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04414.0	Sales Account Management	Contains correspondence, quotations, proposals, and other records used to target and manage customer sales	Sales	Customers: No Longer Than After Last Use + 6 Years;	As Long As Needed For Business Purposes, But No

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			accounts.		Unsold Prospects: No Longer Than 3 Years	Longer Than Official Version Retention Period
Sales & Marketing	04415.0	Sales Audits	Documents internal and external audits of pricing documents, invoices, and related records. Includes audits completed by the company, its customers, or third parties on behalf of its customers.	Office Coordinating Audit	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04417.0	Sales Orders	Documents sales orders submitted for the company's products and services. Includes purchase requests, confirmations, proofs, order updates, inquiries, and related records.	Sales	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04419.0	Sales Promotions	Documents sales promotions targeted to customers, sales representatives, or distribution channel members. Includes plans, analyses, and other related records.	Sales	Until Promotion Expires	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Technology	07001.0	Conservation Management	Documents planning and reporting to support conservation management. Includes tracking requirements under the Endangered Species Act and other records.	Reporting Location	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07003.0	Equipment Information	Contains records pertaining to equipment and parts installed in the manufacturing locations. Includes manuals, catalogs, specification sheets, warranties, and other records.	Location	Life of Equipment + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07007.0	Manufacturing Equipment and Process Standards	Contains manufacturing equipment and process standards in force at the company.	Technology	Until Superseded Or Outdated + 15 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07006.0	Manufacturing Instructions	Contains descriptions of the various manufacturing processes utilized in the company's plants (such as sequence of operations, procedure controls points, and monitoring methods). Includes data reporting methods, acceptance numbers, corrective action plans for nonconformity, and other related records.	Technology	Until Superseded Or Outdated + 15 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07015.0	Manufacturing Materials	Documents specifications for the raw materials used in the production of	Technology	Until Superseded Or Outdated + 15 Years	As Long As Needed For Business

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		Specifications	the company's products.			Purposes, But No Longer Than Official Version Retention Period
Technology	07014.0	Product and Process Testing	Documents testing done on the company's products and processes. Includes tests and measurements, results, analyses, reports, and related records.	Technology	No Longer Than 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07010.0	Project Management - Technology Projects	Documents the projects undertaken to develop or improve new products or services, enhance production processes, and improve reliability. Includes samples, models, statistical analysis, memos, studies, computer models, raw data specifications, and other related records.	Technology Project Manager	Approved: After Project Completed + 15 Years; Non-Approved: No Longer Than After Final Decision + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07025.0	Research and Laboratory Notebooks	Documents scientific, technical, and experimental work completed concerning the company's research, development, and process improvement activities. Includes laboratory notebooks, test results, reports, technical research data, and supporting records.	Technology	200 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Administrative	00962.0	Administrative Support - Calendars and Day Planning	Contains calendars and day planning information. Includes date, time, event description, and related information.	Department	No Longer Than 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00963.0	Administrative Support - Contacts and Mailing Lists	Contains internal and external contact data, directories, mailing and distribution lists, and related information.	Department	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00961.0	Administrative Support - Correspondence	Contains general and routine correspondence that does not set policy or establish procedures. Includes transmittals (i.e., fax cover sheets), acknowledgments, general requests for information or publications, announcements, notices, reading files, and related routine memos.	Department	No Longer Than 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00964.0	Administrative Support - Travel Planning	Contains itineraries, confirmations, and other travel planning records.	Department	No Longer Than 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00950.0	Buildings and Grounds Security	Documents monitoring of access to company premises. Includes visitor logs, parking, surveillance digital	Location	Security Badges: Until Expired; Other Records: No	As Long As Needed For Business Purposes, But No

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			files, security badges, and related records.		Longer Than 3 Years	Longer Than Official Version Retention Period
Administrative	00934.0	Internal Operational / Management Reporting	Contains internal reporting not specified in other areas of the Master Records Retention Schedule. Includes management reporting, balanced scorecards, department goals and objectives, headcount analysis and reports, trending analysis, and any other reporting for operational analysis.	Office Preparing Report	Historical Trending Reports: No Longer Than 10 Years; Other Records: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00919.0	Meeting Management & Participation	Documents company committees and internal meetings, except for those related to the Board of Directors and those specified in other areas of the Master Records Retention Schedule. Includes agenda, minutes, exhibits, notes, and related records.	Meeting Chair	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00922.0	Policies, Procedures, Guidelines, and Processes	Contains internally-developed policies, procedures, guidelines, and processes. Includes records supporting their development.	Office of Issuance	Compliance, Environment Health & Safety, and Human Resources Policies: After Superseded Or Outdated + 10 Years; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Administrative	00933.0	Policies, Procedures, Guidelines and Processes - Records Management	Contains records management-related internally-developed policies, procedures, guidelines, and processes. Includes records supporting their development.	Legal	Policies and Master Records Retention Schedule: After Superseded Or Outdated + 6 Years; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00929.0	Presentations and Speeches	Contains speeches and presentations given to internal and external audiences by company personnel. Includes presentation slides, scripts, notes, and related records.	Office Delivering the Presentation / Speech	No Longer Than 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00926.0	Records Storage & Destruction	Documents records sent to off-site storage and records destroyed on-site and off-site. Includes transmittal forms describing records sent to storage, permanent withdrawals, destruction notifications, and certificates of destruction from third party service providers.	Office Responsible for Records	After Destroyed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00927.0	Reference Materials	Contains working files and reference materials used to track, locate, retrieve, or provide information. Includes filing lists, logs, published resources, research, articles, office equipment and personal computing reference materials, regulatory and	Department	Until Superseded Or No Longer Needed, and Review Regularly For Disposal	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			industry information, vendor information files, and other reference materials used for business purposes.			
Administrative	00935.0	Service Requests	Documents requests for services such as information technology, facilities and maintenance, technical services, mailings, or other internal services. Includes request forms, actions taken, resolutions, and any follow-up with the requester.	Department Processing Request	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Administrative	00945.0	Surveys	Documents internal and external surveys, questionnaires, and studies such as customer, employee, salary, mystery shopper, general job demand, and benchmarking. Includes questions, results, and interpretations.	Office Conducting Survey	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Corporate	11162.0	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Agreements and Closing Documents	Contains agreement and required closing documents. Includes letter of intent, applications, opinions, Securities & Exchange Commission (SEC) registration statements, regulatory filings, final agreement, and related records.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11161.0	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Due Diligence	Contains documents generated and gathered during the course of due diligence for proposed mergers, sales, acquisitions, and joint ventures. Includes reports, correspondence, analyses, and other records used to evaluate the proposed transaction. Note: For successful transactions, records received from the other party that become official records of International Paper should be reclassified under the appropriate records series.	Offices Involved In Due Diligence Process	Successful Transaction Unless Final Agreement Stipulates Retention: After Agreement Executed + 6 Years; Transaction Not Completed: Follow Terms Of Agreement Or No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11117.0	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Transition Services	Documents services provided to non-International Paper entities during transaction transitions. Includes copy of contract, licenses and certifications, reports, correspondence, timesheets, and related records.	Offices Involved in Transitional Process	All Tax Audits Completed and Contract Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11003.0	Board and Committees Minute Books and Records	Documents actions taken by the Board of Directors and Committees of the Board for International Paper and its subsidiaries. Includes pre-read	Corporate Secretary (International Paper and US	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official

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			materials, agendas, minutes, exhibits, appointments and resignations, and related records.	Subsidiaries; Responsible Party (Non-US Subsidiaries)		Version Retention Period
Corporate	11022.0	Board of Directors and Officers - Selection and Retention	Documents the selection and retention of Board of Directors and the appointment of officers. Includes backgrounds of individuals who have served on the Board of Directors or as company officers.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11102.0	Charitable Contributions	Documents charitable contributions made by a location or department. Includes applications, correspondence, donation description, authorizations, copy of documentation sent to Accounts Payable, and related records.	Office Approving Contribution	Approved and Tax Deductible: All Tax Audits Completed; Denied and Non-Tax Deductible: No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11103.0	Communications - External	Contains external communications concerning issues affecting the company and matters of interest to the public. Includes press releases, policy statements, responses to questions from the public or the media, and related records.	Office Issuing the Communication	No Longer Than 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11104.0	Communications - Internal	Contains internal company communications to employees concerning programs, plans, and projects. Includes news and information, policy statements, correspondence, and other records.	Office Issuing the Communication	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Corporate	11105.0	Company Performance Reporting	Documents financial results and business plans communicated to analysts, rating agencies, investors, and other external parties. Includes reports, presentations, workpapers, and related records.	Investor Relations	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11007.0	Compensation - Board of Directors	Documents development, participation, implementation, and administration of the company's Board of Directors' compensation plan. Includes plan design, plan documents, fees and expenses documentation, payouts, and related records.	Corporate Secretary; Global Compensation & Benefits	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11019.0	Corporate Organization and Ownership	Contains articles of incorporation, bylaws, charters, and other records documenting the formation, structure, reorganization, and dissolution of the company and its subsidiaries. Includes regulatory applications and approvals, registration statements, trade names (such as doing business as, also known as), and other supporting records.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11021.0	Delegation of Authority	Documents the internal delegation and distribution of authority within the company. Includes records identifying persons authorized to sign certain documents (such as contracts), approve payments, or take other	Office Controlling the Delegation Authority	Until Superseded Or Obsolete	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			action on behalf of the company.			
Corporate	11106.0	Event Management	Documents charitable, political, corporate, and community programs and events coordinated by the company, including Board of Directors' meetings. Includes lists of participants, program / event information, results, and other records.	Office Managing the Event	Board-Related Events: 10 Years; Other Events: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11107.0	Executive Biographies	Biographical information sheet on key executives and officers. Includes photos, assignment history, and related records.	Communications; Global Compensation & Benefits	Employee Termination + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11108.0	Foundation Management	Documents oversight and administration of the Foundation. Includes annual reports, analyses, expenditures, registrations, tax reporting, and related records.	Foundation	All Tax Audits Completed and Foundation Operations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11109.0	Image Management	Documents digital and analog image assets created by or for the company and used to document company assets and events. Includes photos, negatives, slides, transparencies, videos, and digital versions.	Office Responsible for Controlling Image Access	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11110.0	Industry Reporting	Documents information provided to industry and trade associations. Contains reports, studies, papers, and	Office Submitting Report	5 Years	As Long As Needed For Business Purposes, But No

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			other records covering market share, sales, production, pricing, and related information.			Longer Than Official Version Retention Period
Corporate	11111.0	Legislative Tracking	Documents tracking of legislation impacting the company. Includes draft bills, amendments, background material, lobby reports, trade associated reports, and other related records.	Government Relations	No Longer Than 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11120.0	Lobbying Activities	Documents issues and actions made to influence decisions of legislators, government agencies, constituents, and advocacy groups. Includes position papers, letters, studies, committee hearings, and related records.	Government Relations	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11112.0	Media Coverage	Documents externally generated media coverage of company activities. Includes newspaper and journal articles, photographs, videos, and related records.	Communications	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11113.0	Political Action Committee Management	Documents committee organized to raise funds in support of candidates or causes of interest to the company. Includes Political Action Committee (PAC) Board meetings and approval information, committee information, receipts, bank account statements and reconciliations, candidate letters, check requests, disbursements, and	Government Relations	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			other related records.			
Corporate	11114.0	Public Information Requests	Documents requests for information received from ratings agencies, investors, analysts, and the public. Includes correspondence, company publications, and related records.	Investor Relations	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11035.0	State Business Licenses	Documents the company's right to conduct business in each state. Includes applications and filing packages, registrations, licenses, certifications, records of the registered process agents authorized to act on behalf of the company, and related records.	Corporate Secretary	Registered Process Agents Records: 10 Years; Other Records: Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11036.0	Stock Exchange Listings	Documents stock exchange listings including the New York Stock Exchange (NYSE). Includes application, listing agreement, trade volume, market value of shares, and other records supporting the continued listing on the exchange.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Corporate	11116.0	Stockholder Records	Documents company stock issuance and program. Includes annual reports, stock transfers, stock cancellations, dividend distributions, proxy and voting records, and related records.	Corporate Secretary	Proxy and Voting Records: 6 Years; Other Records: Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period



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Corporate	11051.0	Stockholder Records - Shareholder Listings	Contains annual shareholder listing.	Corporate Secretary	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Environment, Health & Safety	09085.0	Audits and Assessments - Internal - Environment, Health & Safety	Documents internal audit reports and assessments on compliance with environmental, safety, and health requirements such as health and safety audits, internal assessments including key elements survey (KES), risk management plans, process safety management (PSM), process hazard analysis (PHA), and others. Includes reports, workpapers, corrective action plans, supporting documentation, and related records.	Location	Last Two PSM Audits: Issue Date + 6 Years; Internal Assessments: After Superseded Or Outdated; Other Audits and Records: After Audit Issued / Correction Plan Completed + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09150.1	Consent Orders, Citations and Notices of Violations (NOVs)	Documents compliance with citations, consent orders, agreements, warnings, and notices of violations received from government environmental, safety, and health inspectors for violations of environmental, safety, and health regulations (including those from the Environmental Protection Agency (EPA), Occupational Safety & Health Administration (OSHA), and Department of Transportation (DOT)), fire marshals, and other state or local agency inspectors. Includes consent orders, agreements, citations, notices, assessments, corrective action plans, response and remediation documentation, correspondence, and related records.	Location	Consent Orders and Agreements: After Resolved and Obligations Cease + 10 Years; Other Records: After Resolved + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Environment, Health & Safety	09005.0	Emergency Response and Prevention Plans	Contains Storm Water Pollution Prevention (SWPP), Spill Prevention Control and Countermeasure (SPCC), and other environmental and safety / accident prevention plans such as those for fire and natural disaster. Includes plans, risk assessments, worst case scenarios, and related records.	Location	After Superseded Or Outdated Or Per Permit Requirements, Whichever Is Longer + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09300.0	Environmental and Hazardous Materials Program Management	Documents the management and administrative oversight of the company's environmental and hazardous materials programs. Includes program development records, regulatory compliance requirements, surveys, action plans, project oversight documentation, employee communications, and other related documentation.	Corporate Environment, Health & Safety; Location	After Superseded Or Outdated + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09270.0	Environmental Credits Management	Documents management of the carbon off-set, greenhouse gas, wetlands, or other environmental credit programs. Includes applications, credits, purchase and sale documentation, invoices and payments, inventory, audits, reports, correspondence, and related records.	Corporate Environment, Health & Safety; Tax	After Sold Or Expired + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09015.0	Environmental Monitoring and Testing	Documents required monitoring and testing for air and water quality, pollutant emissions, equipment leaks, and other matters mandated by	Location	5 Years Unless Longer Retention Mandated By Permit, Agreement, Order, or	As Long As Needed For Business Purposes, But No Longer Than Official

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			regulation, permit, agreement, or order. Includes performance tests, monitoring inspections, emission averaging, continuous flow measurements, reports, equipment calibrations, test results, strip chart recordings, and other records.		Regulatory Submission	Version Retention Period
Environment, Health & Safety	09352.0	Environmental Permits - Exemptions	Documents reasons for claiming exemption from procuring an environmental permit. Includes correspondence, analyses, reports, calculations, and other supporting records.	Location	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09351.0	Environmental Permits - Issued	Documents issuing of environmental permits except permits for solid waste and hazardous materials storage facilities. Includes applications, environmental statements, plans, analyses, reports, and supporting documentation. Note: For permits related to solid waste and hazardous materials storage facilities, see "Solid Waste and Hazardous Materials Storage Facilities".	Location	Final Applications and Permits: Permanent; Supporting Documentation: After Permit Superseded Or Expired + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09160.0	Equipment Safety Inspection and Testing	Contains records pertaining to equipment safety inspections and testing (such as those for power industrial trucks [lift trucks], fire protection equipment, cranes,	Location	Most Current Until Superseded: 5 Years; Annual: 3 Years; Quarterly: 2 Years; Monthly: 1 Year;	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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			elevators, and fired and unfired pressure vessels). Includes inspections, test results, remedial actions, and related records.		Weekly and Daily: 90 Days	Period
Environment, Health & Safety	09305.0	Hazardous Materials (HAZMAT) Site Security Plans	Contains required hazardous materials plans at sites. Includes plans, risk assessments, worst case scenarios, and other records supporting implementation.	Location	After Superseded Or Outdated + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09055.0	Hazardous Materials Removal Project Management	Documents hazardous materials abatement projects. Includes project plans, drawings, training, licenses and registrations, description of operations and procedures followed, disposal site information, environmental testing, medical surveillance and exposure records for the project personnel, and related records.	Location	Medical Surveillance and Exposure Records: Move To “Medical Records” After Project Completed; Other Records: After Project Completed + 30 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09260.0	Incident Tracking	Documents recordable and other environmental and safety incidents. Includes date, type of incident, response, and incident investigation related records.	Corporate Environment, Health & Safety; Location	Recordable: 5 Years; Other Incidents: 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09065.0	Industrial Hygiene	Documents measures taken to monitor the workplace environment for hazardous substances or conditions, except for radiation exposure. Includes methodologies	Location	40 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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			used, sampling plans, summary of background data relevant to interpreting results obtained, laboratory reports and worksheets, and related records. Note: For records related to radiation exposure, see "Industrial Hygiene-Radiation".			Period
Environment, Health & Safety	09311.0	Industrial Hygiene - Radiation Protection	Documents measures taken to protect employees and contractors against radiation exposure. Includes protection program provisions, Nuclear Regulatory Commission (NRC) Forms 4 and 5, audits and reviews, surveys, samplings, calibrations, individual dose limits, and related records.	Location	Protection Audits, Reviews, Surveys, Samplings, Calibrations, Forms 4 & 5, and Supporting Records: 3 Years; Other Records: After License Terminated + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09110.0	Injury and Illness Reporting	Contains required federal, state, and local government reporting of on-the-job injuries and illnesses (such as those for the Occupational Safety & Health Administration (OSHA)). Includes reports, logs, privacy case lists, surveys, and annual summary forms. Note: Excludes drug testing, worker's compensation, and health and disability documentation.	Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09090.0	Licenses, Registrations, Accreditations and	Contains required licenses and accreditations for operations. Includes applications, licenses,	Location	After Expired + 3 Years	As Long As Needed For Business Purposes, But No

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		Certifications - Environment, Health & Safety	certifications, and related records.			Longer Than Official Version Retention Period
Environment, Health & Safety	09045.0	Material Safety Data Sheets (MSDS)	Documents a substance's physical and chemical properties, potential hazards when using, precautions to take, proper storage, clean up procedures, and other information. Includes chemical identity, ingredients, characteristics, hazardous properties, safe handling, and other information.	Location Using Hazardous Materials	After Superseded Or Outdated + 30 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09080.0	Medical Records	Documents medical treatment and assessment of employees and contractors. Includes complaints, injuries and illnesses, examinations, audiometric testing, hazardous substance exposure surveillance monitoring, diagnoses, test results, treatment, and related records.	On-Site Registered Nurse (RN) or Designee	Employee or Contractor Termination + 40 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09120.0	Pesticide Applications	Documents use of pesticides on company property. Includes applications, inspections, sampling notifications, and other records.	Location	2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09316.0	Safety and Health Program Management	Documents the management and administrative oversight of the company's employee safety and health programs, including bloodborne pathogens. Includes program development records,	Corporate Health & Safety; Location	After Superseded Or Outdated + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			regulatory compliance requirements, action plans, project oversight documentation, employee communications, and other related documentation.			
Environment, Health & Safety	09100.0	Safety Committee Meetings	Documents issues taken up by local safety committees. Includes member rosters, agendas, meeting minutes, exhibits, and related records.	Location	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09170.1	Safety Permits and Procedures	Contains safety permits, fit tests, and procedures to protect employees and contractors and to meet regulatory requirements for certain operations. Includes hot work and confined space entry permits, respiratory fit tests, and internal procedures such as line breaking, power line, man basket, jack hammer, trenching, and groundbreaking.	Location	Permits: After Expired + 1 Year; Fit Tests: Until Next Testing; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09326.0	Solid Waste and Hazardous Materials Storage Facilities	Documents processing, treatment, storage, and closure and post closure plans and cost estimates at solid waste treatment, landfill, and hazardous waste facilities. Includes applications, environmental statements, permits, reports, studies, site plans, groundwater monitoring, air emissions testing, inspections, certifications, closure plans, post-	Corporate Environment, Health & Safety, Location	Permits, Final Application, and Final Closure Records: Permanent; Testing and Inspections: 5 Years; Other Records: After Site Closed + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			closure cost estimates, and related records.			
Environment, Health & Safety	09190.0	Spills and Releases	Documents reporting and remediation activities for environmental spills and releases, other than those involving Superfund sites and storage tanks. Includes reports, analyses, studies, remediation plans, supporting documentation, and related records. <u>Note:</u> For records related to Superfund sites and storage tanks, see "Spills and Releases -Superfund Sites (Including State Equivalent)" and "Storage Tanks".	Location	After Remediation Completed + 5 Years, Or As Mandated By Permit, Agreement, Or Order	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09321.0	Spills and Releases - Superfund Sites (Including State Equivalent)	Documents activities at locations designated as a Superfund site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), or a State Equivalent. Includes environmental assessments, notification of hazardous waste site, record of decision, studies, analyses, reports, correspondence, expenses, CERCLA claims, closure documentation, and related records.	Location	After Site Closed + 50 Years, Unless Specified By Order Or Decree	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09200.0	Storage Tanks	Documents operations and maintenance of above and below ground storage tanks. Includes installation, calibration, piping protection, system inspections, tests, release detection, leak cleanup,	Location	Life of Tank + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			maintenance, repairs, closure, and related records.			
Environment, Health & Safety	09210.0	Toxic Substances Control	Documents production, use, and distribution of chemicals or mixture of chemicals as regulated by the Toxic Substance Control Act (TSCA). Includes chemical inventories, corrective actions, and related records.	Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09250.0	Waste Shipments	Documents receipt, shipment, or transfer of hazardous and non-hazardous waste. Includes shipping manifests, tickets, papers, and related records.	Location	Hazardous Waste Shipments: 5 Years; Other Shipments: 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Environment, Health & Safety	09075.1	Workers Compensation Claims Management	Documents workers compensation claims filed against the company. Includes injury reports, investigations, board hearings, treatment, billing, denials, appeals, judgments, releases, and related settlement records.	Claims Administrator	Releases / Settlement Papers: 75 Years; Denied Claims: After Decision Made + 3 Years; Other Records: After Settled and Last Payment Issued + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Finance	02004.0	Accounting Policies & Interpretations	Documents accounting practices and principles used to determine appropriate treatment of company transactions. Includes notices, action plans, policy statements, and related records.	Corporate Accounting & Financial Reporting	All Tax Audits Completed and Policy Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02260.0	Accounts Payable	Documents company payments made for goods and services. Includes invoices, billings, payment requests, purchase orders, payment authorizations, employee travel and expense reporting, charitable contributions, procurement and company credit card statements, receipts for goods, journal entries, and related records supplying details to expense transactions.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02261.0	Accounts Receivable	Documents monies received for goods and services. Includes billings, receipts, journal entries, revenue statements, reconciliations, write-offs, recoveries, and related records.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02012.0	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Financial Analysis	Documents financial implications of a proposed company acquisition, merger, joint venture, or divestiture. Includes reports, analyses, supporting documentation, and related records.	Corporate Accounting & Financial Reporting; Planning & Analysis; Office Responsible for	All Tax Audits Completed and Ownership / Participation Terminated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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				Managing Due Diligence		
Finance	02008.0	Bank Account Administration	Documents administration of bank accounts. Includes agreements, correspondence, signature authorizations, and related relationship records.	Treasury	After Account Closed + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02262.0	Banking and Cash Management	Documents banking and cash management transactions. Includes statements, drafts, deposits, wire and other transfers, confirmations, credits, reconciliations, reports, and related records.	Treasury; Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02285.0	Corporate Consolidated Financials	Documents the consolidated financials to support the company's final Financial Statements. Includes individual financial statements by reporting locations, consolidation and performance reporting adjustments, and related records.	Corporate Accounting & Financial Reporting	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02013.0	Corporate Credit Cards	Documents issuance of procurement and travel and expense credit cards to employees. Includes applications, authorizations, account changes, and related records.	Finance Operations; Service Provider	After Account Closed + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02015.0	Customer Credit Accounts	Documents issuance of credit to customers. Includes account applications, references, credit	Credit; Controlling Office	All Tax Audits Completed and Account Closed	As Long As Needed For Business Purposes, But No

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			reports, copies of guarantees and promissory notes, correspondence, collections, payment plans, write-offs, and related records.			Longer Than Official Version Retention Period
Finance	02270.0	Customer Credit Card Transaction Form	Documents customer credit card transactions sent to Accounts Receivable. Includes name, account number, card expiration date, and related information.	Credit; Controlling Office	180 Days	None Permitted
Finance	02275.0	Debt Instruments and Management	Documents the borrowing, lending and management of loans, bonds, and other debt instruments. Includes agreements, bonds, mortgages, promissory notes, stock certificates, schedules, reports to lenders, payments, and related records.	Treasury; Controlling Office	All Tax Audits Completed and Debt Repaid	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02280.0	Debt Management - Intercompany Loans	Documents the management of intercompany loans. Includes agreements, amendments, schedules, reports, and related records.	Treasury; Controlling Office	All Tax Audits Completed and Debt Repaid	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02018.0	Derivatives and Other Treasury Transactions	Documents derivative and other treasury transactions entered into by the company such as currency swaps, stock repurchases, timber monetization, and bond buybacks. Includes foreign currency transaction details, hedge accounting documentation, valuation schedules,	Corporate Accounting & Financial Reporting	All Tax Audits Completed and Transaction Terminated, Expired, Or Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			confirmations, correspondence, workpapers, and other records.			
Finance	02021.0	Financial Analyses and Reporting	Documents sales, costs, and other financial conditions affecting the company used to support management decision-making. Includes reports, studies, forecasts, trends, plans, rating agency reviews, goodwill impairment valuations, and related records.	Corporate Accounting & Financial Reporting; Planning & Analysis; Local Accounting Office	Goodwill Impairment Evaluations: All Tax Audits Completed; Other Records: 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02019.0	Financial Audits – External	Contains financial audits performed by service providers. Includes audit reports, correspondence, and related records.	Corporate Accounting & Financial Reporting; Office Audited	7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02020.0	Financial Guarantees	Contains financial guarantees provided by the company. Includes letters of credit, "comfort letters", and related records.	Treasury	All Tax Audits Completed and Guarantee Expired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02029.0	Financial Internal Control Reporting	Contains key financial reports that are used to support audit verifications. Includes review and approval, and supporting documentation.	Department	Annual, Semi-Annual & Quarterly Reports: 1 Year; Monthly Reports: 6 Months; Daily & Weekly Reports: 3 Months	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Finance	02010.1	Financial Planning and Forecasting	Documents development and monitoring of annual company financial plan. Includes revenue and expenditure forecasts, variances, budget plans, workpapers, monitoring reports, allocations, and related records.	Controlling Office	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02022.0	Financial Statements	Contains official annual and quarterly reports documenting the general financial condition and operation of the company. Includes valuations, costs, expenses, explanatory statements, and related information. Note: Quarterly statements are summarized in the annual statement which is prepared and signed by the company's outside auditor.	Corporate Accounting & Financial Reporting; Tax; Office Preparing Statement	Annual Statement: Permanent; Other Records: 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02024.0	Fixed Assets	Contains records used to track company fixed assets, including real estate, buildings, equipment, vehicles, and other similar fixed assets. Includes asset registers, depreciation schedules, amortization, valuations, appraisals, property acquisition and disposal, transfers, and related records.	Global Financial Services; Office Responsible for Asset Accounting	All Tax Audits Completed and Asset Depreciated & Disposed Of	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02263.0	General Ledger	Documents general ledger transactions. Includes account reconciliation, balance sheet reporting, chart of accounts, journal entries, validations, inventory	Office Responsible for Processing or Reconciling Transactions	Final General Ledger For Year: Permanent; Other Records: All Tax Audits	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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			calculations, and related records used for final accounting of annual business activities.		Completed	Period
Finance	02052.0	Imputed Income	Documents tax liability associated with an employee's commute, personal travel, or use of other company property. Includes documentation, calculations, determination, and related records.	Human Resources Service Center; Office Responsible for Calculation	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02026.0	Insurance Coverage	Documents company insurance coverage for general liability, casualty, worker compensation, fire, vehicle, flood, travel, environmental, and other areas. Includes policies, bonds, certificates, riders, premiums paid, loss summaries, correspondence, and related records.	Global Risk Management; Office Securing Policy	Casualty and Liability Policies, Bonds, and Certificates (Including Environmental and Hazardous Materials Coverage): Permanent; Other Policies, Bonds, and Certificates: After Expired + 10 Years; Other Records: All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02027.0	Intellectual Property - Royalties	Documents the receipt of royalties from license agreements. Includes agreements, payments, correspondence, and related records.	Legal	All Tax Audits Completed and Agreement Expired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Finance	02264.0	Intercompany Accounting	Documents intercompany transactions. Includes account transfers, reconciliations, invoices, transmittals, journal vouchers, journal entries, and related records.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02056.0	Internal Control Documentation	Documents review of company financial statements and mechanisms used to prevent and detect fraud. Includes reports, QR 16 representation letters, SAS 70 testing results, internal control tracking, correspondence, and related records.	Department	7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02030.0	Investment Performance - Money Market Management	Documents the management of company-owned, short-term money market investment funds. Includes statements, confirmations, correspondence, and related records.	Treasury	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02031.0	Investment Performance - Retirement Fund Reporting	Documents the performance of investments used to fund the company's retirement programs. Includes reports created by service providers, fund names, gains and losses, and related information.	Trust Investments	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02049.0	Manufacturing Costs	Documents costs of manufacturing products. Includes standard costs and variances, reports, studies, workpapers, calculations, cost determinations, raw materials, finished goods, and related records.	Office Responsible for Cost Determination	Standard Costs: All Tax Audits Completed; Other Records: No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Finance	02265.0	Payroll	Documents amount received and deductions taken from employee's pay. Includes master payroll report, vouchers, reconciliations, and related records.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02051.0	Regulatory Compliance - Financial Control Plans	Documents compliance with regulatory control plans, such as those for the Internal Revenue Service (IRS). Includes process designs, control matrixes, testing plans, and related records.	Finance; Information Technology	After Superseded Or Outdated + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02035.0	Regulatory Reporting - Financial Certifications	Contains annual statements issued by the Chief Executive Officer (CEO) and Chief Financial Officer (CFO) certifying the company's financial statements and related disclosures. Includes sub-certifications.	Legal; Financial Policy and Control	After Filed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02115.0	Regulatory Reporting - Securities & Exchange Commission (SEC) Filings	Contains annual and quarterly Securities & Exchange Commission (SEC) filings such as 8-K, 10-K, 10-Q, and Form 5, eXtensible Business Reporting Language (XBRL) reporting, and other required filings. Includes filings and supporting documentation.	Corporate Secretary; Corporate Accounting & Financial Reporting	Filings: Permanent; Other Records: After Filed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02032.0	Risk Management - Locations	Documents measures taken at locations to mitigate insurance risks. Includes copies of engineering drawings, site inspections, reports,	Global Risk Management	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official



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			and related records.			Version Retention Period
Finance	02037.0	State Sales Tax Exemption Certificates	Documents exemption to a buyer or a seller from paying state sales tax on the specified item.	Location	All Tax Audits Completed and Certificate Expired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02009.0	Surety Bonds	Contains contract and commercial surety bonds for products and services. Includes performance, court, license and permit, and miscellaneous bonds, correspondence, and related records.	Global Risk Management	Contract Obligations Cease + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02040.0	Tax Audit Files	Documents audits done on federal, state, and local tax returns. Includes copy of return and workpapers, documentation requests, responses, copies of records submitted, correspondence, settlement, closing agreements, and related records.	Tax	All Tax Audits Settled + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02290.0	Tax Basis Files	Documents company's tax basis in subsidiaries, partnerships, joint ventures, and other investments. Includes workpapers and supporting documentation.	Tax	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02041.0	Tax Filings - Returns and Workpapers	Documents preparation and submission of company tax returns, including income, sales and use taxes, excise, property, franchise, payroll,	Office Submitting Filing	Income Tax Returns: 75 Years; Other Records: After Tax Audit Settled +	As Long As Needed For Business Purposes, But No Longer Than Official

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			and others with federal, state, and local taxing authorities. Includes submitted returns, workpapers, adjustments, credits, disclosures, exemptions, and supporting records.		10 Years	Version Retention Period
Finance	02042.0	Tax History Files	Documents positions taken on tax filings. Includes determination letters, Internal Revenue Service (IRS) agent reports, copy of closing agreements, rulings, legal opinions, court orders, and related records.	Tax	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02043.0	Tax Identification Certification - W-9s	Documents tax-related information received from service providers in order to prepare required 1099 forms.	Global Sourcing; Finance; Location	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02044.0	Tax Withholding Forms	Documents wages paid and taxes withheld that were reported to taxing authorities. Includes Forms 1099, W-2, 941, and other required state and federal forms.	Finance Operations; Human Resources Service Center	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Finance	02046.0	Unclaimed Property Reporting	Documents unclaimed and escheated property reported to states. Includes reports and supporting documentation.	Corporate Accounting & Financial Reporting	25 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Human Resources	03001.0	Affirmative Action Plans	Contains company and location-specific affirmative action plans. Includes plans, reports, audits, and supporting records.	Diversity & Compliance; Location	After Plan Issued + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03418.0	Benefit Claims	Documents claims submitted for medical, retirement, and other company benefits. Includes eligibility, calculations, determination, escalations, decisions, appeals, payments, and related records.	Claims Administrators	After Claim Resolved + 7 Years and All Payouts Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03006.0	Benefit Claims Reporting	Documents claims paid under company benefit plans. Includes reports from claims administrators and claims data used for historical trending.	Global Compensation & Benefits	Claims Data: 10 Years; Reports: 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03008.1	Benefit Plans - Administration	Contains records documenting the administration of the company's benefit plans. Includes claims administrator agreements and amendments, rate structure determinations, actuarial valuations, calculations, funding support, and other related records.	Global Compensation & Benefits	Agreements and Amendments: Contract Obligations Cease + 6 Years; Other Records: 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03417.0	Benefit Plans - Enrollments and Elections	Documents annual participation in company benefit plans. Includes enrollments, elections, beneficiary and change forms, and related data.	Human Resources Service Centers; Location	After Superseded + 6 Years Or Plan Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official

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						Version Retention Period
Human Resources	03210.0	Benefit Plans - Governance and Reporting	Contains finalized benefit plans and records documenting governance for medical, pension, insurance, savings, and other company benefits, including those of legacy plans and programs obtained through acquisitions and mergers. Includes plans, amendments and revisions, summary plan descriptions, non-discrimination testing, Form 5500 and other Employee Retirement Income Security Account (ERISA) filings, summary annual report (SAR) to participants, Internal Revenue Service (IRS) fringe benefit filings, and working papers.	Global Compensation & Benefits; Benefits Accounting; Legal	Workpapers: After Plan Finalized + 3 Years; Other Records: Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03012.0	Compensation Plans - Awards	Contains records used to formulate specific payouts to employees and retired executives under the Performance Share Plan (PSP), Management Incentive Plan (MIP), Supplemental Executive Retirement Plan (SERP), and the merit award, gainsharing, bonus, stock option, and commission programs. Includes awards, payouts, stock option grants, calculations and other workpapers, correspondence, and records of legacy plans and programs obtained through	Human Resources Manager; Global Compensation & Benefits	All Tax Audits Completed and Final Payout + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			acquisitions and mergers.			
Human Resources	03011.0	Compensation Plans - Development	Documents development of annual compensation plans and programs for hourly, salaried, commission, and executive employees. Includes policies, guidelines, salary structure data, and other records.	Global Compensation & Benefits	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03015.0	Disability and Medical Leaves	Documents application for and decision made to grant an employee leave, including short term (STD) and long term disability (LTD), sickness and accident (S&A), and leaves under the Family Medical and Leave Act (FMLA). Includes forms, correspondence, determination, and related records.	Human Resources Service Center	After Decision Made Or Leave Completed, Whichever Is Longer + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03016.0	Drug Testing	Documents drug testing for job applicants and company employees. Includes chain of custody forms, test results, and related records.	Human Resources Manager; Employee Service Center	Positive Employee Results: 10 Years; Positive Applicant Results: 3 Years; Negative Results: 1 Year	None Permitted
Human Resources	03017.0	Employee Issues	Documents non-legal issues brought by or concerning company employees, such as complaints or internal disciplinary matters. Includes correspondence, investigation notes, reports, findings, and determinations.	Human Resources Manager; Supervisor	After Resolved + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03035.0	Employee Relocation	Documents process for relocating employees. Includes approval forms, invoices and other expense	Human Resources Operations	All Tax Audits Completed + 7 Years	As Long As Needed For Business Purposes, But No

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			documentation, agreements, correspondence, tax equalization information, policy exceptions, and related records.			Longer Than Official Version Retention Period
Human Resources	03019.1	Employment Eligibility Verifications	Documents employee eligibility to work within the United States. Includes Form I-9, H-IB visa documentation, green card labor applications and notifications, TN and L-1A visa immigration and naturalization forms, correspondence, and related records.	Human Resources Manager; Employee Service Center	Employee Termination + 3 Years	None Permitted
Human Resources	03020.0	Grievances	Documents formal complaint and proceedings brought by an employee concerning alleged violation of collective bargaining or legal employment rights. Includes complaint, investigation, mediation, arbitration, determination, appeal, and related records.	Location	Labor Union Grievances: After Settled + 10 Years; Other Grievances: After Settled + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03402.0	Job Catalog	Documents approved positions within the company. Includes position number, name, and description.	Global Compensation & Benefits	After Superseded	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03205.0	Labor Relations - Bids and Awards	Documents union bid and award process for covered positions. Includes seniority rosters, bids, awards, and related records.	Human Resource Manager; Location	Seniority Rosters: After Superseded + 2 Years; Other Records: After	As Long As Needed For Business Purposes, But No Longer Than Official

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					Position Awarded + 2 Years	Version Retention Period
Human Resources	03024.0	Labor Relations - Collective Bargaining Campaigns	Documents strategy adopted during collective bargaining agreement campaigns. Includes worksheets, cost analyses, campaign materials, presentations, correspondence, benefits offerings such as health & welfare, and related records.	Employee Relations	Contract Obligations Cease + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03025.0	Labor Relations - Collective Bargaining Negotiations	Documents negotiations over collective bargaining agreements. Includes correspondence, meeting minutes, analyses of issues, position statements, benefit cost information, draft agreement language, and related records. Note: For official union agreements, see "Contracts and Agreements - Collective Bargaining".	Employee Relations; Location	Contract Obligations Cease + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03045.0	Labor Relations - Union Employee Notices	Documents mandatory work-related notices given to union employees per their union agreement. Includes facility shutdowns and other events affecting their work environment.	Location	Until Contract Obligations Cease Unless Retention Specified Per The Agreement	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03920.0	Manager's Employee Desk File	Documents manager's discussions with employees during one on ones, career development or disciplinary actions. Includes notes and other related records to assist manager in performance reviews and career	Department	No Longer Than Termination Or Transfer + 1 Year	None Permitted

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			discussions. Note: Any employee records that are deemed to be part of the "Official Employee Record" should be sent to the Human Resources Manager for inclusion in the employee's "Official Employee Record"			
Human Resources	03030.0	Official Employee Record	Documents employee history with the company. Includes application, offer letter and hiring documents, employment contracts and agreements, personnel change notices, compensation history, certifications, awards, letters of commendation, skills testing results, performance evaluations, termination checklists and releases, and related records. Note: For a complete listing of records considered to be part of the "Official Employee Record", see Human Resources Policy 405 - Employee Records Management.	Human Resources Manager; Global Compensation & Benefits	Employee Termination + 10 Years and Contract Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03029.1	Payroll Deductions	Documents authorizations and court ordered withholdings for payroll deductions. Includes direct deposit, tax withholdings, loans, promissory notes, child support levies, garnishments and liens, authorization forms, status changes, W-4s, and related records.	Human Resources Service Center; Location	Loans, Liens, and Garnishments: Final Payment + 7 Years; Other Records: After Authorization Superseded / Employee Termination + 4 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Human Resources	03220.0	Personnel Strategy Planning	Contains people reviews, succession planning and related records.	Human Resources; Department	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03401.0	Position Descriptions	Contains description of positions. Includes requirements, responsibilities, duties, and other details on positions.	Human Resources; Compensation; Department Issuing Job Description	After Superseded / Position Abolished + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03033.0	Recruitment Program	Documents efforts made to advertise and recruit for open positions. Includes job postings, advertisements, diversity outreach letters, correspondence, and related records.	Human Resources Manager	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03414.0	Recruitment Program - Background Checks	Contains reference, credit, and other background checks. Includes reports, notes, correspondence, and related records.	Human Resources Manager	3 Years	None Permitted
Human Resources	03413.0	Recruitment Program - Hiring and Selection	Documents employee hiring and selection process for open positions. Includes applications, resumes, testing materials, interview logs, and related records.	Human Resources Manager	Records For Successful Candidate: Move To "Official Employee Record"; Records For Other Applicants: After Decision Made + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Human Resources	03034.0	Regulatory Reporting - Equal Employment Opportunity Commission (EEOC)	Documents required reporting to the Equal Employment Opportunity Commission (EEOC). Includes EEO-1 and VETS-100 reports.	Diversity & Compliance; Location	After Report Issued + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03038.0	Time Reporting	Documents employee time reporting. Includes time sheets, time tickets, and other records detailing hours worked. Note: For time sheets and related records for temporary employees, contractors, consultants, and other service providers, see "Accounts Payable".	Human Resources Service Center; Entry Location	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03026.0	Training - Management Development Program	Documents development of courses used to train employees on management and leadership skills. Includes manuals, guides, employee interviews, instructional content, and related records.	Staffing & Development	After Superseded / No Longer Used + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03938.0	Training - Non Regulated	Documents company training not mandated by law or regulation. Includes training schedules, attendance sheets, course materials, and related records.	Office(s) Responsible for Development / Delivery and / or Attendance Tracking	Course Materials: After Superseded Or Outdated + 3 Years; Other Records: 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Human Resources	03040.0	Training - Regulated	Documents company training mandated by law or regulation, such as antitrust, safety, equipment operation, hazardous materials	Office(s) Responsible for Development / Delivery and / or	Certificates Of Completion: Employee Termination + 6	As Long As Needed For Business Purposes, But No Longer Than Official

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			handling, and others. Includes training schedules, attendance sheets, course materials, certificates of completion, and related records.	Attendance Tracking	Years; Course Materials: After Superseded Or Outdated + 6 Years; Other Records: 6 Years	Version Retention Period

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Information Technology	05100.0	Asset Management - Information Technology Equipment	Documents life cycle of computer and other information technology equipment. Includes make, model, serial number, location, and other information.	Information Technology	After Equipment Disposed Of + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05030.0	Computer System Application Documentation	Documents purchase or in-house creation of applications, including implementation and removal / disposal of computer software from company systems. Includes purchasing, installation, software keys, source code / program listing, application design documentation, job control language, upgrades, modifications, removals / disposition, and other related records.	Information Technology	Financial Applications Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Data Is Migrated Or Purged and Documentation Is No Longer Relevant To Existing Data, Or The Application Is Permanently Retired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05009.0	Hardware Documentation	Documents purchase, implementation, and disposal of computer hardware used in company systems. Includes warranties, operating manuals and documentation, installation configurations into system architecture, inspection, maintenance, repair, disposition, and other related records.	Information Technology	Architecture, Configurations, and Documentation For Systems Supporting Tax Audits: All Tax Audits Completed; Other Records: After Hardware Disposed Of + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05010.1	Information Technology	Documents hardware and software standards and related processes used	Information Technology	Until Superseded Or Outdated	As Long As Needed For Business

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		Standards and Processes	by the company. Includes quality assurance, design, review, support, process flow diagrams, and other related records.			Purposes, But No Longer Than Official Version Retention Period
Information Technology	05008.0	Internet Domain Names and Addresses	Documents the management of the company's domain names and addresses. Includes names, addresses, host servers, registrations, renewals, and other related records.	Information Technology	After Registration Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05905.0	Project Management - Information Systems	Contains all project management documentation supporting a new application or enhancements to an existing application. Includes project delivery process (PDP) documentation, business requirements and analysis, project plans, work plans, change requests, and other related records.	Project Manager	Financial Programs Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Data Is Migrated Or Purged and Documentation Is No Longer Relevant To Existing Data, Or The Application Is Permanently Retired.	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05014.0	Software Management and Licensing	Documents the use of software in the company (such as those on the desktop, enterprise, server, third party tools, and mobile applications) to ensure system compatibility and compliance with license and copyright provisions. Includes software evaluations, compatibility	Information Technology; Location	Financial Programs Holding Information Needed For Open Tax Audits: All Tax Audits Completed and License Expired + 6 Years / Application No	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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			testing, software licenses, site licenses, and other related records.		Longer Used ; Other Records: License Expired + 6 Years / Application No Longer Used	
Information Technology	05015.0	System Monitoring Activities	Documents electronic files or automated logs created to monitor computer system activities. Includes operations, applications and database logs (such as internet usage or error logs), and other related records.	Information Technology; Office Monitoring Activity	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05016.0	System Table Maintenance	Documents the additions, deletions and changes of items in system tables.	Office Responsible for Table Maintenance	Master Data Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Information Technology	05001.0	System User Access	Documents access provided to users. Includes security login information, name, user ID, date, system, and other related information.	Information Technology; Office Controlling Access	Network User Id: 99 Years; Other Records: Until Deleted Or Outdated	None Permitted

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Legal	01039.0	Acquisitions and Sales - Real Property	Documents real estate acquisitions and sales. Includes abstracts, agreements, closing statements, deeds, easements, liens, promissory notes, mortgage documents, loan financing documents, amendments, addendums, notices of commencement, partitions, surveys, title insurance, transfers, sales, and other records documenting ownership or use.	Legal; IP Realty	Closing & Title Documents: Permanent; Abandoned Acquisitions / Sales Transactions: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01001.0	Advice and Counsel	Documents advice and counsel given by the Legal Department on matters affecting the company. Includes correspondence and supporting records.	Legal	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01058.0	Antitrust Oversight and Control	Documents antitrust oversight and control activities. Includes reports, studies, competitor contacts, correspondence, findings, actions taken, and related records.	Legal	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01005.0	Business and Product Development Legal Oversight	Documents oversight of business and product development activities. Includes copies of sales and marketing analyses, market research, industry information, development information, marketing collateral, sales materials, and related records.	Legal	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Legal	01017.0	Compliance Program Development and Maintenance	Documents compliance program activities. Includes program goals and objectives, responsibility statements, certifications, and related records.	Office Responsible for Design, Implementation and / or Enforcement	Certifications: Until Superseded Or Outdated + 6 Years; Other Records: After Program Terminated + 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01055.0	Conflict of Interest Waivers	Documents waivers granted by the company to outside counsel. Includes waivers, correspondence, and related records.	Legal	After Waiver Terminated + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01066.0	Contracts and Agreements	Contains agreements and contracts other than those specified in other areas of the Master Records Retention Schedule. Includes leases, renewals, amendments, change orders, correspondence, and other supporting records. Note: For employee related contracts and agreements, see "Official Employee Record".	Office Controlling Contractual Relationship	Environmental Or Hazardous Materials Remediation, Storage, Clean-Up, Or Other Services: Contract Obligations Cease + 50 Years; Other Records: Applicable Tax Audits Completed and Contract Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01067.0	Contracts and Agreements - Collective Bargaining	Documents agreements with labor unions as part of the collective bargaining process.	Human Resources Manager	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Legal	01012.0	Contracts and Agreements - Improvements to Real Property	Contains contracts and agreements for design, construction, renovation, and improvements to company buildings and real estate. Includes contracts, agreements, renewals, amendments, correspondence, and supporting records.	Office Managing the Property	All Tax Audits Completed and Assets Depreciated & Disposed Of	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01023.0	Foreign Trade Barrier Matters	Documents trade barriers and other restrictions on international sales or exports. Includes language of barrier / regulation, reports, analyses, opinions, correspondence, and related records.	Legal	After Barrier / Requirement Removed + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01200.0	Helpline Cases	Documents complaints or issues received by the Helpline. Includes complainant's allegations, call notes, investigation, resolution, and related records. Note: This includes records and other data pertaining to breaches in security or allegations of fraud at company locations.	Ethics Office; Office Responsible for Investigation or Resolution	After Resolved + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01024.1	Insurance Claims	Documents liability and non-liability claims for reported incidents under the company's insurance policies. Includes loss reports and supporting records.	Legal; Global Risk Management	After Settled + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01061.0	Intellectual Property - Abandoned Trademark	Documents abandoned registration of trademarks. Includes correspondence, opinions, applications, searches, and	Legal	Application Abandoned + 6 Years	As Long As Needed For Business Purposes, But No

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		Applications	related records.			Longer Than Official Version Retention Period
Legal	01063.0	Intellectual Property - Clearance Searches and Opinions	Documents searches and analysis of intellectual property rights of others in relation to company's activities, products, and processes. Includes correspondence, opinions, searches, and other related records.	Legal	Life Of Intellectual Property Rights + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01062.0	Intellectual Property - Common Law Trademarks	Documents company's use of its common law trademarks. Includes searches and other related records.	Legal	Date Trademark Use Discontinued + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01027.0	Intellectual Property - Copyrights	Contains copyright applications and registrations. Includes correspondence, searches, and other related records.	Legal	After Copyright Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01029.0	Intellectual Property - Patents	Documents patent filings and related administrative proceedings such as oppositions, re-examinations or interferences. Includes applications, fee transmittals, specifications, correspondence, opinions, oaths, declarations, and related records.	Legal	After Patent Application Abandoned, Or Last Foreign Or U.S. Counterpart Lapsed Or Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Legal	01030.0	Intellectual Property - Registered Trademarks	Documents registering of company trademarks. Includes registrations, filings, certifications, specimens, renewals, and supporting records.	Legal	Life of Registration and / or Registration Cancelled + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01064.0	Intellectual Property - Trademark Searches	Documents trademark searches conducted. Includes search records, specimens, and right-to-use opinions.	Legal	After Search Completed + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01065.0	Intellectual Property - Unfiled Records of Inventions	Documents records of inventions that have not been filed. Includes correspondence, opinions, searches, and related records.	Legal	200 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01032.0	Legal Proceedings	Documents litigation and claims other than those specified in other areas of the Master Records Retention Schedule. Includes notices, statements, pleadings, judgments, opinions, and related records. Note: For the release and / or settlement agreement, see "Releases and Settlements".	Legal (Managing Attorney)	After Resolved Or No Activity + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01072.0	Legal Proceedings - Asbestos	Contains records related to asbestos litigation and claim cases.	Legal (Managing Attorney)	Permanent	As Long As Needed For Business Purposes, But No

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						Longer Than Official Version Retention Period
Legal	01033.0	Legal Proceedings - Attachments and Garnishments	Contains court orders, change orders, withholding support for employee attachments and garnishments.	Legal	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01073.0	Legal Proceedings - Remediation	Documents remediation related to Comprehensive Environmental Response Compensation and Liability Act (CERCLA / Superfund), Resource Conservation and Recovery Act (RCRA), or other remediation and state equivalent regulations. Includes settlement agreements and other related records.	Legal (Managing Attorney)	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01070.0	Legal Proceedings - Service of Process	Contains summonses or other documents issued by a court or administrative agency served on the company or its registered agent for service of process.	Legal	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01059.0	Legal Proceedings - Third Party Subpoenas & Other Information Requests	Documents orders, subpoenas, and other requests received from third parties. Includes order, subpoena, response, correspondence, and related records.	Legal	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Legal	01056.0	Licenses, Registrations and Certifications – Federal Communications Commission (FCC)	Contains license applications, registrations and certifications approved by the Federal Communications Commission (FCC).	Office Managing the License	Duration of License	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01008.0	Policies Acknowledgements	Contains forms signed by company employees documenting their acknowledgement and / or agreement to abide by various company policies or standards of behavior.	Office Controlling Process	Until Superseded Or Outdated + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01038.0	Political Action Committee Filings	Documents activities of the company's Political Action Committee (PAC). Includes registration, reporting, and related records.	Government Relations	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01075.0	Product Liability Warranty Claims	Documents warranty claims received on the company's products. Includes claim, investigation, and related records. Note: For the release and / or settlement agreement, see "Releases and Settlements".	Legal	Masonite Claims: Warranty Period Or No Longer Than After Settled + 18 Years; Other Claims: After Settled or Released + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01205.0	Regulatory Audits - External	Documents external audits, examinations, and reviews from regulatory authorities such as the Securities and Exchange Commission (SEC), Department of Energy (DOE),	Legal	No Longer Than After Completed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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			Department of Transportation (DOT), Office of Federal Contract Compliance Programs (OFCCP), Environmental Protection Agency (EPA), Occupational Safety & Health Administration (OSHA), and other regulatory agencies. Includes questionnaires received from auditors, responses to auditors, action plans if applicable, and related records.			Period
Legal	01041.0	Regulatory Communications	Documents communications with regulators on various compliance matters. Includes inquiries from regulators, the company's responses, and supporting documentation.	Office Communicating with Regulator	Non-Time Limited Regulatory Settlements, Obligations and / or Undertakings: Permanent; Other Records: After Superseded + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01042.0	Regulatory Reporting	Documents regulatory reporting other than those specified in other areas of the Master Records Retention Schedule (such as Medicare Reporting). Includes workpapers, data files, and related records.	Office Responsible for Submission	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01069.0	Releases and Settlements	Contains releases and settlements, other than those specified in other areas of the Master Records Retention Schedule, that document the release of the company from future	Legal	75 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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			obligations and / or terms to settle a legal matter.			Period
Legal	01057.0	Right of Ways and Easements	Documents the legal rights enabling the company or another entity to transport goods over a particular land or property. Includes easements, agreements, right-of-ways, correspondence, and related records.	Global Supply Chain	After Revoked or Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01068.0	Transportation Claims - Loss / Damage	Documents transportation and loss damage claims. Includes findings, damaged load information, correspondence, credits, adjustments, write-offs, and related records.	Global Supply Chain	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Legal	01074.0	Vehicle Titles	Contains forms issued by the states' Department of Motor Vehicles (DMV) establishing the company as the legal owner of a vehicle. Includes related records. <u>Note:</u> For registration records, see "Vehicle Records".	Vehicle Location	Until Vehicle Disposed Of Or Sold	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Operations	08103.0	Aircraft Operations and Maintenance	Documents the management of company aircraft. Includes titles, registrations, logbooks, aircraft engine records, inspections, maintenance records, incident reports, flight plans, and related records.	Aviation	After Aircraft Disposed Of + 1 Year Or Transfer To New Owner	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08104.0	Bids and Proposals	Documents bids issued by the company for products and services and responses received. Includes bids, Requests for Information (RFI) / Requests for Proposals (RFP) issued, responses, evaluations, correspondence, and related records.	Global Supply Chain; Office Responsible for Bid Process	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08125.0	Bills of Lading	Documents delivery of materials and products within the United States. Includes date, transporter, contents, destination, and related information. Note: For international destinations, see "Import / Export Control".	Shipping Location	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08130.0	Building and Grounds Maintenance	Documents janitorial, grounds keeping, and other facility work performed on company properties. Includes work orders, statement of repairs or work completed, and related records.	Location	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08230.0	Business Continuity	Documents business continuity and disaster planning. Includes actual plans, testing, and other related records.	Location or Department	Until Superseded	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Operations	08113.0	Business Planning	Contains business plans for operations. Includes strategy, sales, marketing, staffing, and related records.	Office Preparing the Plan	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08105.0	Certificates of Insurance - Contractors	Contains certificates of insurance for the parties retained to provide contracted services. Includes coverage in effect, dates of inception and expiration, limits, and named insured.	Office Controlling Contractual Relationship	Life Of Relationship With Contractor + 20 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08106.0	Contract and Lease Management	Documents the management of the terms and conditions of the company's contracts and leases for services, equipment, and real property. Includes copies of contracts / agreements, reports, correspondence, and other related records.	Global Supply Chain; Office Managing Lease	Contract Obligations Cease + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08001.0	Crop Management	Documents the planning, planting, monitoring and harvesting of trees in the company's research plots. Includes data measurements, analyses, and other related records.	Location	No Longer Than After Harvest + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08107.0	Distribution Warehouse Management	Documents administrative oversight of the operations at the warehouses used to receive and ship company products.	Global Supply Chain	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Operations	08110.1	Driver and Vehicle Inspections	Contains required Department of Transportation (DOT) inspections and remedial actions taken. Includes commercial driver's inspections of vehicle and roadside inspections.	Vehicle Location	Roadside Inspections: 1 Year; Driver's Inspections: 3 Months	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08108.0	Driver Logs	Documents commercial driver's hours of service for Department of Transportation (DOT) reporting. Includes driver's logs that contain the name of the driver, dates, times, locations, and related information.	Vehicle Location	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08109.0	Driver Qualification Records	Documents drivers' ability or qualifications to drive a commercial motor vehicle.	Vehicle Location	Employee Termination + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08128.0	Equipment Maintenance	Documents repair and maintenance of equipment owned or leased by the company. Includes routine maintenance, preventive maintenance, scheduling, repairs, calibrations, inspections, analysis reports, logs, and other related records.	Location	Maintenance, Inspections, and Repair Records: Life Of Equipment + 10 Years; Analysis Reports and Logs: No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08003.0	Facility and Equipment Plans and Drawings	Documents design of company facilities and equipment. Includes plans and drawings, specifications, schematics, and other related records.	Project Manager	Facilities: After Sold, Ownership Transferred, Or Demolished + 6	As Long As Needed For Business Purposes, But No Longer Than Official

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					Years; Equipment: After Disposition + 6 Years	Version Retention Period
Operations	08005.0	Facility Plan	Documents planned changes in technology, equipment, or space to meet the long-range needs of the facility or operation.	Location	Until Outdated + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08126.0	Import / Export Control	Contains required import / export documentation. Includes applications, authorizations, inventories, correspondence, and related records.	Shipping and / or Receiving Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08240.0	Internal Audits	Documents internal audits performed on company operations, other than those specified in other areas of the Master Records Retention Schedule. Includes reports, testing, peer reviews, self assessments, and related records.	Department Performing Audit	Financial Audits: 7 Years; Other Audits: Until Superseded or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08114.0	Inventory Reconciliation	Documents amount of goods, materials, equipment and other company property. Includes inventory reports, cycle counts, reconciliations, and related records.	Office Managing Inventory	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08006.0	Lot Samples	Contains specimens and samples used to test the quality of the company's products during production.	Location Conducting Test	No Longer Than 1 Year	As Long As Needed For Business Purposes, But No

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						Longer Than Official Version Retention Period
Operations	08115.0	Materials and Supplies Management	Documents requisition, receipt, consumption, and distribution of materials from company storerooms and locations. Includes requisitions, transfers, inventories, tallies, scale tickets, scrap tickets, weights, and related records.	Office Managing Materials and / or Supplies	4 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08250.0	Pilot Qualification Records	Documents pilot's qualification to fly an aircraft. Includes records required by the Federal Aviation Administration (FAA) such as proficiency checks, training, certifications, and related records.	Aviation	Employee Termination + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08220.0	Product Stewardship and Certification	Documents information provided to customers on annual certification of products and chemical constituents. Includes test results, life cycle assessments, certificates, approvals, attestations, and related records.	Sustainability	Test Results, Assessments, Certifications, Attestations, and Approvals: After Superseded Or Outdated, + 6 Years; Other Records: 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08127.0	Production Management	Documents production activities for management purposes. Includes plans, schedules, downtime reporting, trim sheets, production orders, and other related records.	Production Location; Planner	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Operations	08906.0	Project Management - Capital Projects	Documents capital improvement and renovation projects. Includes plans, drawings, studies, analyses, reports, approvals, cost estimates, project workpapers, copies of purchase orders and other accounts payable documentation, payments, and related records.	Project Manager	Completed Projects: All Tax Audits Completed and Sold Or Disposed Of; Abandoned Projects: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08924.0	Project Management - Process Improvement Projects	Documents operational or productivity improvements. Includes the project plans, meeting minutes, deliverables, and other related records.	Project Manager	No Longer Than After Project Completed + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08009.0	Quality Audits	Contains reports and documentation related to the audits of the company's quality assurance processes and systems.	Location Audited	7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08010.0	Quality Certification	Documents measures taken by a plant to meet the quality requirements determined by the International Organization for Standardization (ISO) or other external standards organizations.	Location	Life of Certification + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08011.0	Quality Control	Documents quality controls used on company products. Includes material and process assessments, tests, quality audits, certificates of analysis (COA), and related records.	Location Conducting Test	After Warranty Period Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention

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						Period
Operations	08129.0	Railroad Records	Contains inspections, test and repair records, dispatch records, and hours of service records.	Operating Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08012.0	Right of Entry Permits and Licenses	Documents permission given to the public and others to access company property for social or recreational purposes. Includes applications, licenses and permits issued, and supporting records.	Office Issuing Permit	After Expired + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08225.0	Sustainable Forestry Initiatives and Chain of Custody Management	Documents activities to meet the Sustainable Forestry Initiative, ISO 14001, and other product stewardship certifications and standards. Includes certifications, audits, monitoring, and related records.	Sustainability	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08120.0	Transportation Carriers Management	Contains rate schedules, performance reviews, and other records used to manage the relationship with the company's transportation carriers.	Office Managing Relationship	No Longer Than Life Of Relationship + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Operations	08121.0	Transportation Planning & Coordination	Contains data and records used to plan and coordinate the movement of products via truck, parcel, rail, and ocean shipments.	Global Supply Chain	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period



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Operations	08123.0	Vehicle Records	Contains registration, maintenance, inspections, and repair records of the company-controlled motor vehicles. Includes dispatcher's logs, registers, gasoline logs, and other related records.	Vehicle Location	Registrations: After Expired + 3 Years; Other Records: 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Sales & Marketing	04403.0	Competitive Intelligence	Documents intelligence gathered on competitors providing similar products and services. Includes reports, studies, analyses, trends, forecasts, and related records.	Marketing	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04405.0	Corporate Brand Management	Documents the development and usage of the names, signs or symbols that uniquely identify the company's products and services.	Marketing	After Last Use + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04505.0	Customer Accounts Management	Documents customer-specific product requirements. Includes specifications, sample requests, technical records, job bags, and related information.	Sales; Technology	No Longer Than Life Of Relationship + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04404.0	Customer Complaints	Contains customer complaints concerning company products and services. Includes complaints, company responses, and other related records.	Office Resolving the Complaint	External Consumer Products Complaints: After Resolved + 4 Years; Other Complaints: After Resolved + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04407.0	Market Research	Documents market research done on products, services, and customers. Includes reports, studies, analyses, surveys, and related records.	Marketing	Until Superseded Or Outdated + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Sales & Marketing	04500.0	Marketing and Advertising	Documents marketing campaigns and advertising of company products and services. Includes campaign development, reports, requests, studies, job files and jackets with specifications, advertisements, marketing collateral, surveys, and related records.	Marketing	After Last Use + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04411.0	Pricing	Documents development of general and customer-specific pricing for products and services. Includes price surveys, price lists, price rules, price models, price deviation approvals, and related records.	Office Responsible for Setting Prices	Until Superseded Or Outdated + 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04412.0	Product Development and Management	Documents development of product and service lines. Includes concepts, ideas, analyses, specifications, change authorizations, information sheets, implementation planning, commercialization rollouts, and related records.	Marketing; Technology	Life Of Product Line + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04413.0	Prospect Management	Contains identification and qualification of prospective customers for company goods and services.	Office Managing Leads	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04414.0	Sales Account Management	Contains correspondence, quotations, proposals, and other records used to target and manage customer sales	Sales	Customers: No Longer Than After Last Use + 6 Years;	As Long As Needed For Business Purposes, But No

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			accounts.		Unsold Prospects: No Longer Than 3 Years	Longer Than Official Version Retention Period
Sales & Marketing	04415.0	Sales Audits	Documents internal and external audits of pricing documents, invoices, and related records. Includes audits completed by the company, its customers, or third parties on behalf of its customers.	Office Coordinating Audit	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04417.0	Sales Orders	Documents sales orders submitted for the company's products and services. Includes purchase requests, confirmations, proofs, order updates, inquiries, and related records.	Sales	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Sales & Marketing	04419.0	Sales Promotions	Documents sales promotions targeted to customers, sales representatives, or distribution channel members. Includes plans, analyses, and other related records.	Sales	Until Promotion Expires	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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Technology	07001.0	Conservation Management	Documents planning and reporting to support conservation management. Includes tracking requirements under the Endangered Species Act and other records.	Reporting Location	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07003.0	Equipment Information	Contains records pertaining to equipment and parts installed in the manufacturing locations. Includes manuals, catalogs, specification sheets, warranties, and other records.	Location	Life of Equipment + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07007.0	Manufacturing Equipment and Process Standards	Contains manufacturing equipment and process standards in force at the company.	Technology	Until Superseded Or Outdated + 15 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07006.0	Manufacturing Instructions	Contains descriptions of the various manufacturing processes utilized in the company's plants (such as sequence of operations, procedure controls points, and monitoring methods). Includes data reporting methods, acceptance numbers, corrective action plans for nonconformity, and other related records.	Technology	Until Superseded Or Outdated + 15 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07015.0	Manufacturing Materials	Documents specifications for the raw materials used in the production of	Technology	Until Superseded Or Outdated + 15 Years	As Long As Needed For Business

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		Specifications	the company's products.			Purposes, But No Longer Than Official Version Retention Period
Technology	07014.0	Product and Process Testing	Documents testing done on the company's products and processes. Includes tests and measurements, results, analyses, reports, and related records.	Technology	No Longer Than 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07010.0	Project Management - Technology Projects	Documents the projects undertaken to develop or improve new products or services, enhance production processes, and improve reliability. Includes samples, models, statistical analysis, memos, studies, computer models, raw data specifications, and other related records.	Technology Project Manager	Approved: After Project Completed + 15 Years; Non-Approved: No Longer Than After Final Decision + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
Technology	07025.0	Research and Laboratory Notebooks	Documents scientific, technical, and experimental work completed concerning the company's research, development, and process improvement activities. Includes laboratory notebooks, test results, reports, technical research data, and supporting records.	Technology	200 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
00962.0	Administrative	Administrative Support - Calendars and Day Planning	Contains calendars and day planning information. Includes date, time, event description, and related information.	Department	No Longer Than 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00963.0	Administrative	Administrative Support - Contacts and Mailing Lists	Contains internal and external contact data, directories, mailing and distribution lists, and related information.	Department	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00961.0	Administrative	Administrative Support - Correspondence	Contains general and routine correspondence that does not set policy or establish procedures. Includes transmittals (i.e., fax cover sheets), acknowledgments, general requests for information or publications, announcements, notices, reading files, and related routine memos.	Department	No Longer Than 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00964.0	Administrative	Administrative Support - Travel Planning	Contains itineraries, confirmations, and other travel planning records.	Department	No Longer Than 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00950.0	Administrative	Buildings and Grounds Security	Documents monitoring of access to company premises. Includes visitor logs, parking, surveillance digital files, security badges, and related records.	Location	Security Badges: Until Expired; Other Records: No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00934.0	Administrative	Internal Operational / Management Reporting	Contains internal reporting not specified in other areas of the Master Records Retention Schedule. Includes management reporting, balanced scorecards, department goals and objectives, headcount analysis and reports, trending analysis, and any other reporting for operational analysis.	Office Preparing Report	Historical Trending Reports: No Longer Than 10 Years; Other Records: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00919.0	Administrative	Meeting Management & Participation	Documents company committees and internal meetings, except for those related to the Board of Directors and those specified in other areas of the Master Records Retention Schedule. Includes agenda, minutes, exhibits, notes, and related records.	Meeting Chair	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00922.0	Administrative	Policies, Procedures, Guidelines and Processes	Contains internally-developed policies, procedures, guidelines, and processes. Includes records supporting their development.	Office of Issuance	Compliance, Environment Health & Safety, and Human Resources Policies: After Superseded Or Outdated + 10 Years; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
00933.0	Administrative	Policies, Procedures, Guidelines and Processes - Records Management	Contains records management-related internally-developed policies, procedures, guidelines, and processes. Includes records supporting their development.	Legal	Policies and Master Records Retention Schedule: After Superseded Or Outdated + 6 Years; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00929.0	Administrative	Presentations and Speeches	Contains speeches and presentations given to internal and external audiences by company personnel. Includes presentation slides, scripts, notes, and related records.	Office Delivering the Presentation / Speech	No Longer Than 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00926.0	Administrative	Records Storage & Destruction	Documents records sent to off-site storage and records destroyed on-site and off-site. Includes transmittal forms describing records sent to storage, permanent withdrawals, destruction notifications, and certificates of destruction from third party service providers.	Office Responsible for Records	After Destroyed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00927.0	Administrative	Reference Materials	Contains working files and reference materials used to track, locate, retrieve, or provide information. Includes filing lists, logs, published resources, research, articles, office equipment and personal computing reference materials, regulatory and industry information, vendor information files, and other reference materials used for business purposes.	Department	Until Superseded Or No Longer Needed, and Review Regularly For Disposal	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00935.0	Administrative	Service Requests	Documents requests for services such as information technology, facilities and maintenance, technical services, mailings, or other internal services. Includes request forms, actions taken, resolutions, and any follow-up with the requester.	Department Processing Request	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
00945.0	Administrative	Surveys	Documents internal and external surveys, questionnaires, and studies such as customer, employee, salary, mystery shopper, general job demand, and benchmarking. Includes questions, results, and interpretations.	Office Conducting Survey	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11162.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Agreements and Closing Documents	Contains agreement and required closing documents. Includes letter of intent, applications, opinions, Securities & Exchange Commission (SEC) registration statements, regulatory filings, final agreement, and related records.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
11161.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Due Diligence	Contains documents generated and gathered during the course of due diligence for proposed mergers, sales, acquisitions, and joint ventures. Includes reports, correspondence, analyses, and other records used to evaluate the proposed transaction. Note: For successful transactions, records received from the other party that become official records of International Paper should be reclassified under the appropriate records series.	Offices Involved In Due Diligence Process	Successful Transaction Unless Final Agreement Stipulates Retention: After Agreement Executed + 6 Years; Transaction Not Completed: Follow Terms Of Agreement Or No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11117.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Transition Services	Documents services provided to non-International Paper entities during transaction transitions. Includes copy of contract, licenses and certifications, reports, correspondence, timesheets, and related records.	Offices Involved in Transitional Process	All Tax Audits Completed and Contract Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11003.0	Corporate	Board and Committees Minute Books and Records	Documents actions taken by the Board of Directors and Committees of the Board for International Paper and its subsidiaries. Includes pre-read materials, agendas, minutes, exhibits, appointments and resignations, and related records.	Corporate Secretary (International Paper and US Subsidiaries); Responsible Party (Non-US Subsidiaries)	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11022.0	Corporate	Board of Directors and Officers - Selection and Retention	Documents the selection and retention of Board of Directors and the appointment of officers. Includes backgrounds of individuals who have served on the Board of Directors or as company officers.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11102.0	Corporate	Charitable Contributions	Documents charitable contributions made by a location or department. Includes applications, correspondence, donation description, authorizations, copy of documentation sent to Accounts Payable, and related records.	Office Approving Contribution	Approved and Tax Deductible: All Tax Audits Completed; Denied and Non-Tax Deductible: No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11103.0	Corporate	Communications - External	Contains external communications concerning issues affecting the company and matters of interest to the public. Includes press releases, policy statements, responses to questions from the public or the media, and related records.	Office Issuing the Communication	No Longer Than 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
11104.0	Corporate	Communications - Internal	Contains internal company communications to employees concerning programs, plans, and projects. Includes news and information, policy statements, correspondence, and other records.	Office Issuing the Communication	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11105.0	Corporate	Company Performance Reporting	Documents financial results and business plans communicated to analysts, rating agencies, investors, and other external parties. Includes reports, presentations, workpapers, and related records.	Investor Relations	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11007.0	Corporate	Compensation - Board of Directors	Documents development, participation, implementation, and administration of the company's Board of Directors' compensation plan. Includes plan design, plan documents, fees and expenses documentation, payouts, and related records.	Corporate Secretary; Global Compensation & Benefits	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11019.0	Corporate	Corporate Organization and Ownership	Contains articles of incorporation, bylaws, charters, and other records documenting the formation, structure, reorganization, and dissolution of the company and its subsidiaries. Includes regulatory applications and approvals, registration statements, trade names (such as doing business as, also known as), and other supporting records.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11021.0	Corporate	Delegation of Authority	Documents the internal delegation and distribution of authority within the company. Includes records identifying persons authorized to sign certain documents (such as contracts), approve payments, or take other action on behalf of the company.	Office Controlling the Delegation Authority	Until Superseded Or Obsolete	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11106.0	Corporate	Event Management	Documents charitable, political, corporate, and community programs and events coordinated by the company, including Board of Directors' meetings. Includes lists of participants, program / event information, results, and other records.	Office Managing the Event	Board-Related Events: 10 Years; Other Events: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11107.0	Corporate	Executive Biographies	Biographical information sheet on key executives and officers. Includes photos, assignment history, and related records.	Communications; Global Compensation & Benefits	Employee Termination + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

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11108.0	Corporate	Foundation Management	Documents oversight and administration of the Foundation. Includes annual reports, analyses, expenditures, registrations, tax reporting, and related records.	Foundation	All Tax Audits Completed and Foundation Operations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11109.0	Corporate	Image Management	Documents digital and analog image assets created by or for the company and used to document company assets and events. Includes photos, negatives, slides, transparencies, videos, and digital versions.	Office Responsible for Controlling Image Access	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11110.0	Corporate	Industry Reporting	Documents information provided to industry and trade associations. Contains reports, studies, papers, and other records covering market share, sales, production, pricing, and related information.	Office Submitting Report	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11111.0	Corporate	Legislative Tracking	Documents tracking of legislation impacting the company. Includes draft bills, amendments, background material, lobby reports, trade associated reports, and other related records.	Government Relations	No Longer Than 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11120.0	Corporate	Lobbying Activities	Documents issues and actions made to influence decisions of legislators, government agencies, constituents, and advocacy groups. Includes position papers, letters, studies, committee hearings, and related records.	Government Relations	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11112.0	Corporate	Media Coverage	Documents externally generated media coverage of company activities. Includes newspaper and journal articles, photographs, videos, and related records.	Communications	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11113.0	Corporate	Political Action Committee Management	Documents committee organized to raise funds in support of candidates or causes of interest to the company. Includes Political Action Committee (PAC) Board meetings and approval information, committee information, receipts, bank account statements and reconciliations, candidate letters, check requests, disbursements, and other related records.	Government Relations	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11114.0	Corporate	Public Information Requests	Documents requests for information received from ratings agencies, investors, analysts, and the public. Includes correspondence, company publications, and related records.	Investor Relations	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
11035.0	Corporate	State Business Licenses	Documents the company's right to conduct business in each state. Includes applications and filing packages, registrations, licenses, certifications, records of the registered process agents authorized to act on behalf of the company, and related records.	Corporate Secretary	Registered Process Agents Records: 10 Years; Other Records: Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11036.0	Corporate	Stock Exchange Listings	Documents stock exchange listings including the New York Stock Exchange (NYSE). Includes application, listing agreement, trade volume, market value of shares, and other records supporting the continued listing on the exchange.	Corporate Secretary	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11116.0	Corporate	Stockholder Records	Documents company stock issuance and program. Includes annual reports, stock transfers, stock cancellations, dividend distributions, proxy and voting records, and related records.	Corporate Secretary	Proxy and Voting Records: 6 Years; Other Records: Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
11051.0	Corporate	Stockholder Records - Shareholder Listings	Contains annual shareholder listing.	Corporate Secretary	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09085.0	Environment/Health/Safety	Audits and Assessments - Internal - Environment, Health & Safety	Documents internal audit reports and assessments on compliance with environmental, safety, and health requirements such as health and safety audits, internal assessments including key elements survey (KES), risk management plans, process safety management (PSM), process hazard analysis (PHA), and others. Includes reports, workpapers, corrective action plans, supporting documentation, and related records.	Location	Last Two PSM Audits: Issue Date + 6 Years; Internal Assessments: After Superseded Or Outdated; Other Audits and Records: After Audit Issued / Correction Plan Completed + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
09150.1	Environment/Health/Safety	Consent Orders, Citations, and Notices of Violations (NOVs)	Documents compliance with citations, consent orders, agreements, warnings, and notices of violations received from government environmental, safety, and health inspectors for violations of environmental, safety, and health regulations (including those from the Environmental Protection Agency (EPA), Occupational Safety & Health Administration (OSHA), and Department of Transportation (DOT)), fire marshals, and other state or local agency inspectors. Includes consent orders, agreements, citations, notices, assessments, corrective action plans, response and remediation documentation, correspondence, and related records.	Location	Consent Orders and Agreements: After Resolved and Obligations Cease + 10 Years; Other Records: After Resolved + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09005.0	Environment/Health/Safety	Emergency Response and Prevention Plans	Contains Storm Water Pollution Prevention (SWPP), Spill Prevention Control and Countermeasure (SPCC), and other environmental and safety / accident prevention plans such as those for fire and natural disaster. Includes plans, risk assessments, worst case scenarios, and related records.	Location	After Superseded Or Outdated Or Per Permit Requirements, Whichever Is Longer + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09300.0	Environment/Health/Safety	Environmental and Hazardous Materials Program Management	Documents the management and administrative oversight of the company's environmental and hazardous materials programs. Includes program development records, regulatory compliance requirements, surveys, action plans, project oversight documentation, employee communications, and other related documentation.	Corporate Environment, Health & Safety; Location	After Superseded Or Outdated + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09270.0	Environment/Health/Safety	Environmental Credits Management	Documents management of the carbon off-set, greenhouse gas, wetlands, or other environmental credit programs. Includes applications, credits, purchase and sale documentation, invoices and payments, inventory, audits, reports, correspondence, and related records.	Corporate Environment, Health & Safety; Tax	After Sold Or Expired + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
09015.0	Environment/Health/Safety	Environmental Monitoring and Testing	Documents required monitoring and testing for air and water quality, pollutant emissions, equipment leaks, and other matters mandated by regulation, permit, agreement, or order. Includes performance tests, monitoring inspections, emission averaging, continuous flow measurements, reports, equipment calibrations, test results, strip chart recordings, and other records.	Location	5 Years Unless Longer Retention Mandated By Permit, Agreement, Order, Or Regulatory Submission	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09352.0	Environment/Health/Safety	Environmental Permits - Exemptions	Documents reasons for claiming exemption from procuring an environmental permit. Includes correspondence, analyses, reports, calculations, and other supporting records.	Location	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09351.0	Environment/Health/Safety	Environmental Permits - Issued	Documents issuing of environmental permits except permits for solid waste and hazardous materials storage facilities. Includes applications, environmental statements, plans, analyses, reports, and supporting documentation. Note: For permits related to solid waste and hazardous materials storage facilities, see "Solid Waste and Hazardous Materials Storage Facilities".	Location	Final Applications and Permits: Permanent; Supporting Documentation: After Permit Superseded Or Expired + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09160.0	Environment/Health/Safety	Equipment Safety Inspection and Testing	Contains records pertaining to equipment safety inspections and testing (such as those for power industrial trucks [lift trucks], fire protection equipment, cranes, elevators, and fired and unfired pressure vessels). Includes inspections, test results, remedial actions, and related records.	Location	Most Current Until Superseded: 5 Years; Annual: 3 Years; Quarterly: 2 Years; Monthly: 1 Year; Weekly and Daily: 90 Days	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09305.0	Environment/Health/Safety	Hazardous Materials (HAZMAT) Site Security Plans	Contains required hazardous materials plans at sites. Includes plans, risk assessments, worst case scenarios, and other records supporting implementation.	Location	After Superseded Or Outdated + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09055.0	Environment/Health/Safety	Hazardous Materials Removal Project Management	Documents hazardous materials abatement projects. Includes project plans, drawings, training, licenses and registrations, description of operations and procedures followed, disposal site information, environmental testing, medical surveillance and exposure records for the project personnel, and related records.	Location	Medical Surveillance and Exposure Records: Move To "Medical Records" After Project Completed; Other Records: After Project Completed + 30 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
09260.0	Environment/Health/Safety	Incident Tracking	Documents recordable and other environmental and safety incidents. Includes date, type of incident, response, and incident investigation related records.	Corporate Environment, Health & Safety; Location	Recordable: 5 Years; Other Incidents: 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09065.0	Environment/Health/Safety	Industrial Hygiene	Documents measures taken to monitor the workplace environment for hazardous substances or conditions, except for radiation exposure. Includes methodologies used, sampling plans, summary of background data relevant to interpreting results obtained, laboratory reports and worksheets, and related records. Note: For records related to radiation exposure, see "Industrial Hygiene - Radiation".	Location	40 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09311.0	Environment/Health/Safety	Industrial Hygiene - Radiation Protection	Documents measures taken to protect employees and contractors against radiation exposure. Includes protection program provisions, Nuclear Regulatory Commission (NRC) Forms 4 and 5, audits and reviews, surveys, samplings, calibrations, individual dose limits, and related records.	Location	Protection Audits, Reviews, Surveys, Samplings, Calibrations, Forms 4 & 5, and Supporting Records: 3 Years; Other Records: After License Terminated + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09110.0	Environment/Health/Safety	Injury and Illness Reporting	Contains required federal, state, and local government reporting of on-the-job injuries and illnesses (such as those for the Occupational Safety & Health Administration (OSHA)). Includes reports, logs, privacy case lists, surveys, and annual summary forms. Note: Excludes drug testing, worker's compensation, and health and disability documentation.	Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09090.0	Environment/Health/Safety	Licenses, Registrations, Accreditations and Certifications - Environment, Health & Safety	Contains required licenses and accreditations for operations. Includes applications, licenses, certifications, and related records.	Location	After Expired + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09045.0	Environment/Health/Safety	Material Safety Data Sheets (MSDS)	Documents a substance's physical and chemical properties, potential hazards when using, precautions to take, proper storage, clean up procedures, and other information. Includes chemical identity, ingredients, characteristics, hazardous properties, safe handling, and other information.	Location Using Hazardous Materials	After Superseded or Outdated + 30 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
09080.0	Environment/Health/Safety	Medical Records	Documents medical treatment and assessment of employees and contractors. Includes complaints, injuries and illnesses, examinations, audiometric testing, hazardous substance exposure surveillance monitoring, diagnoses, test results, treatment, and related records.	On-Site Registered Nurse (RN) or Designee	Employee or Contractor Termination + 40 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09120.0	Environment/Health/Safety	Pesticide Applications	Documents use of pesticides on company property. Includes applications, inspections, sampling notifications, and other records.	Location	2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09316.0	Environment/Health/Safety	Safety and Health Program Management	Documents the management and administrative oversight of the company's employee safety and health programs, including bloodborne pathogens. Includes program development records, regulatory compliance requirements, action plans, project oversight documentation, employee communications, and other related documentation.	Corporate Health & Safety; Location	After Superseded Or Outdated + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09100.0	Environment/Health/Safety	Safety Committee Meetings	Documents issues taken up by local safety committees. Includes member rosters, agendas, meeting minutes, exhibits, and related records.	Location	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09170.1	Environment/Health/Safety	Safety Permits and Procedures	Contains safety permits, fit tests, and procedures to protect employees and contractors and to meet regulatory requirements for certain operations. Includes hot work and confined space entry permits, respiratory fit tests, and internal procedures such as line breaking, power line, man basket, jack hammer, trenching, and groundbreaking.	Location	Permits: After Expired + 1 Year; Fit Tests: Until Next Testing; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09326.0	Environment/Health/Safety	Solid Waste and Hazardous Materials Storage Facilities	Documents processing, treatment, storage, and closure and post closure plans and cost estimates at solid waste treatment, landfill, and hazardous waste facilities. Includes applications, environmental statements, permits, reports, studies, site plans, groundwater monitoring, air emissions testing, inspections, certifications, closure plans, post-closure cost estimates, and related records.	Corporate Environment, Health & Safety; Location	Permits, Final Application, and Final Closure Records: Permanent; Testing and Inspections: 5 Years; Other Records: After Site Closed + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
09190.0	Environment/Health/Safety	Spills and Releases	Documents reporting and remediation activities for environmental spills and releases, other than those involving Superfund sites and storage tanks. Includes reports, analyses, studies, remediation plans, supporting documentation, and related records. Note: For records related to Superfund sites and storage tanks, see "Spills and Releases - Superfund Sites (Including State Equivalent)" and "Storage Tanks".	Location	After Remediation Completed + 5 Years, Or As Mandated By Permit, Agreement, Or Order	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09321.0	Environment/Health/Safety	Spills and Releases - Superfund Sites (Including State Equivalent)	Documents activities at locations designated as a Superfund site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), or a State Equivalent. Includes environmental assessments, notification of hazardous waste site, record of decision, studies, analyses, reports, correspondence, expenses, CERCLA claims, closure documentation, and related records.	Location	After Site Closed + 50 Years, Unless Specified By Order Or Decree	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09200.0	Environment/Health/Safety	Storage Tanks	Documents operations and maintenance of above and below ground storage tanks. Includes installation, calibration, piping protection, system inspections, tests, release detection, leak cleanup, maintenance, repairs, closure, and related records.	Location	Life of Tank + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09210.0	Environment/Health/Safety	Toxic Substances Control	Documents production, use, and distribution of chemicals or mixture of chemicals as regulated by the Toxic Substance Control Act (TSCA). Includes chemical inventories, corrective actions, and related records.	Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09250.0	Environment/Health/Safety	Waste Shipments	Documents receipt, shipment, or transfer of hazardous and non-hazardous waste. Includes shipping manifests, tickets, papers, and related records.	Location	Hazardous Waste: 5 Years; Other Shipments: 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
09075.1	Environment/Health/Safety	Workers Compensation Claims Management	Documents workers compensation claims filed against the company. Includes injury reports, investigations, board hearings, treatment, billing, denials, appeals, judgments, releases, and related settlement records.	Claims Administrator	Releases / Settlement Papers: 75 Years; Denied Claims: After Decision Made + 3 Years; Other Records: After Settled and Last Payment Issued + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
02004.0	Finance	Accounting Policies & Interpretations	Documents accounting practices and principles used to determine appropriate treatment of company transactions. Includes notices, action plans, policy statements, and related records.	Corporate Accounting & Financial Reporting	All Tax Audits Completed and Policy Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02260.0	Finance	Accounts Payable	Documents company payments made for goods and services. Includes invoices, billings, payment requests, purchase orders, payment authorizations, employee travel and expense reporting, charitable contributions, procurement and company credit card statements, receipts for goods, journal entries, and related records supplying details to expense transactions.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02261.0	Finance	Accounts Receivable	Documents monies received for goods and services. Includes billings, receipts, journal entries, revenue statements, reconciliations, write-offs, recoveries, and related records.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02012.0	Finance	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Financial Analysis	Documents financial implications of a proposed company acquisition, merger, joint venture, or divestiture. Includes reports, analyses, supporting documentation, and related records.	Corporate Accounting & Financial Reporting; Planning & Analysis; Office Responsible for Managing Due Diligence Process	All Tax Audits Completed and Ownership / Participation Terminated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02008.0	Finance	Bank Account Administration	Documents administration of bank accounts. Includes agreements, correspondence, signature authorizations, and related relationship records.	Treasury	After Account Closed + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02262.0	Finance	Banking and Cash Management	Documents banking and cash management transactions. Includes statements, drafts, deposits, wire and other transfers, confirmations, credits, reconciliations, reports, and related records.	Treasury; Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02285.0	Finance	Corporate Consolidated Financials	Documents the consolidated financials to support the company's final Financial Statements. Includes individual financial statements by reporting locations, consolidation and performance reporting adjustments, and related records.	Corporate Accounting & Financial Reporting	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
02013.0	Finance	Corporate Credit Cards	Documents issuance of procurement and travel and expense credit cards to employees. Includes applications, authorizations, account changes, and related records.	Finance Operations; Service Provider	After Account Closed + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02015.0	Finance	Customer Credit Accounts	Documents issuance of credit to customers. Includes account applications, references, credit reports, copies of guarantees and promissory notes, correspondence, collections, payment plans, write-offs, and related records.	Credit; Controlling Office	All Tax Audits Completed and Account Closed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02270.0	Finance	Customer Credit Card Transaction Form	Documents customer credit card transactions sent to Accounts Receivable. Includes name, account number, card expiration date, and related information.	Credit; Controlling Office	180 Days	None Permitted
02275.0	Finance	Debt Instruments and Management	Documents the borrowing, lending and management of loans, bonds, and other debt instruments. Includes agreements, bonds, mortgages, promissory notes, stock certificates, schedules, reports to lenders, payments, and related records.	Treasury; Controlling Office	All Tax Audits Completed and Debt Repaid	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02280.0	Finance	Debt Management - Intercompany Loans	Documents the management of intercompany loans. Includes agreements, amendments, schedules, reports, and related records.	Treasury; Controlling Office	All Tax Audits Completed and Debt Repaid	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02018.0	Finance	Derivatives and Other Treasury Transactions	Documents derivative and other treasury transactions entered into by the company such as currency swaps, stock repurchases, timber monetization, and bond buybacks. Includes foreign currency transaction details, hedge accounting documentation, valuation schedules, confirmations, correspondence, workpapers, and other records.	Corporate Accounting & Financial Reporting	All Tax Audits Completed and Transaction Terminated, Expired, Or Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02021.0	Finance	Financial Analyses and Reporting	Documents sales, costs, and other financial conditions affecting the company used to support management decision-making. Includes reports, studies, forecasts, trends, plans, rating agency reviews, goodwill impairment valuations, and related records.	Corporate Accounting & Financial Reporting; Planning & Analysis; Local Accounting Office	Goodwill Impairment Evaluations: All Tax Audits Completed; Other Records: 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02019.0	Finance	Financial Audits - External	Contains financial audits performed by service providers. Includes audit reports, correspondence, and related records.	Corporate Accounting & Financial Reporting; Office Audited	7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
02020.0	Finance	Financial Guarantees	Contains financial guarantees provided by the company. Includes letters of credit, "comfort letters", and related records.	Treasury	All Tax Audits Completed and Guarantee Expired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02029.0	Finance	Financial Internal Control Reporting	Contains key financial reports that are used to support audit verifications. Includes review and approval, and supporting documentation.	Department	Annual, Semi-Annual & Quarterly Reports: 1 Year; Monthly Reports: 6 Months; Daily & Weekly Reports: 3 Months	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02010.1	Finance	Financial Planning and Forecasting	Documents development and monitoring of annual company financial plan. Includes revenue and expenditure forecasts, variances, budget plans, workpapers, monitoring reports, allocations, and related records.	Controlling Office	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02022.0	Finance	Financial Statements	Contains official annual and quarterly reports documenting the general financial condition and operation of the company. Includes valuations, costs, expenses, explanatory statements, and related information. Note: Quarterly statements are summarized in the annual statement which is prepared and signed by the company's outside auditor.	Corporate Accounting & Financial Reporting; Tax; Office Preparing Statement	Annual Statement: Permanent; Other Records: 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02024.0	Finance	Fixed Assets	Contains records used to track company fixed assets, including real estate, buildings, equipment, vehicles, and other similar fixed assets. Includes asset registers, depreciation schedules, amortization, valuations, appraisals, property acquisition and disposal, transfers, and related records.	Global Financial Services; Office Responsible for Asset Accounting	All Tax Audits Completed and Asset Depreciated & Disposed Of	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02263.0	Finance	General Ledger	Documents general ledger transactions. Includes account reconciliation, balance sheet reporting, chart of accounts, journal entries, validations, inventory calculations, and related records used for final accounting of annual business activities.	Office Responsible for Processing or Reconciling Transactions	Final General Ledger For Year: Permanent; Other Records: All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02052.0	Finance	Imputed Income	Documents tax liability associated with an employee's commute, personal travel, or use of other company property. Includes documentation, calculations, determination, and related records.	Human Resources Service Center; Office Responsible for Calculation	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
02026.0	Finance	Insurance Coverage	Documents company insurance coverage for general liability, casualty, worker compensation, fire, vehicle, flood, travel, environmental, and other areas. Includes policies, bonds, certificates, riders, premiums paid, loss summaries, correspondence, and related records.	Global Risk Management; Office Securing Policy	Casualty and Liability Policies, Bonds, and Certificates (Including Environmental and Hazardous Materials Coverage): Permanent; Other Policies, Bonds, and Certificates: After Expired + 10 Years; Other Records: All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02027.0	Finance	Intellectual Property - Royalties	Documents the receipt of royalties from license agreements. Includes agreements, payments, correspondence, and related records.	Legal	All Tax Audits Completed and Agreement Expired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02264.0	Finance	Intercompany Accounting	Documents intercompany transactions. Includes account transfers, reconciliations, invoices, transmittals, journal vouchers, journal entries, and related records.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02056.0	Finance	Internal Control Documentation	Documents review of company financial statements and mechanisms used to prevent and detect fraud. Includes reports, QR 16 representation letters, SAS 70 testing results, internal control tracking, correspondence, and related records.	Department	7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02030.0	Finance	Investment Performance - Money Market Management	Documents the management of company-owned, short-term money market investment funds. Includes statements, confirmations, correspondence, and related records.	Treasury	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02031.0	Finance	Investment Performance - Retirement Fund Reporting	Documents the performance of investments used to fund the company's retirement programs. Includes reports created by service providers, fund names, gains and losses, and related information.	Trust Investments	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02049.0	Finance	Manufacturing Costs	Documents costs of manufacturing products. Includes standard costs and variances, reports, studies, workpapers, calculations, cost determinations, raw materials, finished goods, and related records.	Office Responsible for Cost Determination	Standard Costs: All Tax Audits Completed; Other Records: No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02265.0	Finance	Payroll	Documents amount received and deductions taken from employee's pay. Includes master payroll report, vouchers, reconciliations, and related records.	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
02051.0	Finance	Regulatory Compliance - Financial Control Plans	Documents compliance with regulatory control plans, such as those for the Internal Revenue Service (IRS). Includes process designs, control matrixes, testing plans, and related records.	Finance; Information Technology	After Superseded Or Outdated + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02035.0	Finance	Regulatory Reporting - Financial Certifications	Contains annual statements issued by the Chief Executive Officer (CEO) and Chief Financial Officer (CFO) certifying the company's financial statements and related disclosures. Includes sub-certifications.	Legal; Financial Policy and Control	After Filed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02115.0	Finance	Regulatory Reporting - Securities & Exchange Commission (SEC) Filings	Contains annual and quarterly Securities & Exchange Commission (SEC) filings such as 8-K, 10-K, 10-Q, and Form 5, eXtensible Business Reporting Language (XBRL) reporting, and other required filings. Includes filings and supporting documentation.	Corporate Secretary; Corporate Accounting & Financial Reporting	Filings: Permanent; Other Records: After Filed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02032.0	Finance	Risk Management - Locations	Documents measures taken at locations to mitigate insurance risks. Includes copies of engineering drawings, site inspections, reports, and related records.	Global Risk Management	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02037.0	Finance	State Sales Tax Exemption Certificates	Documents exemption to a buyer or a seller from paying state sales tax on the specified item.	Location	All Tax Audits Completed and Certificate Expired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02009.0	Finance	Surety Bonds	Contains contract and commercial surety bonds for products and services. Includes performance, court, license and permit, and miscellaneous bonds, correspondence, and related records.	Global Risk Management	Contract Obligations Cease + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02040.0	Finance	Tax Audit Files	Documents audits done on federal, state, and local tax returns. Includes copy of return and workpapers, documentation requests, responses, copies of records submitted, correspondence, settlement, closing agreements, and related records.	Tax	All Tax Audits Settled + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02290.0	Finance	Tax Basis Files	Documents company's tax basis in subsidiaries, partnerships, joint ventures, and other investments. Includes workpapers and supporting documentation.	Tax	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
02041.0	Finance	Tax Filings - Returns and Workpapers	Documents preparation and submission of company tax returns, including income, sales and use taxes, excise, property, franchise, payroll, and others with federal, state, and local taxing authorities. Includes submitted returns, workpapers, adjustments, credits, disclosures, exemptions, and supporting records.	Office Submitting Filing	Income Tax Returns: 75 Years; Other Records: After Tax Audit Settled + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02042.0	Finance	Tax History Files	Documents positions taken on tax filings. Includes determination letters, Internal Revenue Service (IRS) agent reports, copy of closing agreements, rulings, legal opinions, court orders, and related records.	Tax	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02043.0	Finance	Tax Identification Certification - W-9s	Documents tax-related information received from service providers in order to prepare required 1099 forms.	Global Sourcing; Finance; Location	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02044.0	Finance	Tax Withholding Forms	Documents wages paid and taxes withheld that were reported to taxing authorities. Includes Forms 1099, W-2, 941, and other required state and federal forms.	Finance Operations; Human Resources Service Center	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
02046.0	Finance	Unclaimed Property Reporting	Documents unclaimed and escheated property reported to states. Includes reports and supporting documentation.	Corporate Accounting & Financial Reporting	25 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03001.0	Human Resources	Affirmative Action Plans	Contains company and location-specific affirmative action plans. Includes plans, reports, audits, and supporting records.	Diversity & Compliance; Location	After Plan Issued + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03418.0	Human Resources	Benefit Claims	Documents claims submitted for medical, retirement, and other company benefits. Includes eligibility, calculations, determination, escalations, decisions, appeals, payments, and related records.	Claims Administrators	After Claim Resolved + 7 Years and All Payouts Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03006.0	Human Resources	Benefit Claims Reporting	Documents claims paid under company benefit plans. Includes reports from claims administrators and claims data used for historical trending.	Global Compensation & Benefits	Claims Data: 10 Years; Reports: 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03417.0	Human Resources	Benefit Plans - Enrollments and Elections	Documents annual participation in company benefit plans. Includes enrollments, elections, beneficiary and change forms, and related data.	Human Resources Service Centers; Location	After Superseded + 6 Years Or Plan Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
03008.1	Human Resources	Benefit Plans - Administration	Contains records documenting the administration of the company's benefit plans. Includes claims administrator agreements and amendments, rate structure determinations, actuarial valuations, calculations, funding support, and other related records.	Global Compensation & Benefits	Agreements and Amendments: Contract Obligations Cease + 6 Years; Other Records: 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03210.0	Human Resources	Benefit Plans - Governance and Reporting	Contains finalized benefit plans and records documenting governance for medical, pension, insurance, savings, and other company benefits, including those of legacy plans and programs obtained through acquisitions and mergers. Includes plans, amendments and revisions, summary plan descriptions, non-discrimination testing, Form 5500 and other Employee Retirement Income Security Account (ERISA) filings, summary annual report (SAR) to participants, Internal Revenue Service (IRS) fringe benefit filings, and working papers.	Global Compensation & Benefits; Benefits Accounting; Legal	Workpapers: After Plan Finalized + 3 Years; Other Records: Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03012.0	Human Resources	Compensation Plans - Awards	Contains records used to formulate specific payouts to employees and retired executives under the Performance Share Plan (PSP), Management Incentive Plan (MIP), Supplemental Executive Retirement Plan (SERP), and the merit award, gainsharing, bonus, stock option, and commission programs. Includes awards, payouts, stock option grants, calculations and other workpapers, correspondence, and records of legacy plans and programs obtained through acquisitions and mergers.	Global Compensation & Benefits; Human Resources Manager	All Tax Audits Completed and Final Payout + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03011.0	Human Resources	Compensation Plans - Development	Documents development of annual compensation plans and programs for hourly, salaried, commission, and executive employees. Includes policies, guidelines, salary structure data, and other records.	Global Compensation & Benefits	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
03015.0	Human Resources	Disability and Medical Leaves	Documents application for and decision made to grant an employee leave, including short term (STD) and long term disability (LTD), sickness and accident (S&A), and leaves under the Family Medical and Leave Act (FMLA). Includes forms, correspondence, determination, and related records.	Human Resources Service Center	After Decision Made Or Leave Completed, Whichever Is Longer + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03016.0	Human Resources	Drug Testing	Documents drug testing for job applicants and company employees. Includes chain of custody forms, test results, and related records.	Human Resources Manager; Employee Service Center	Positive Employee Results: 10 Years; Positive Applicant Results: 3 Years; Negative Results: 1 Year	None Permitted
03017.0	Human Resources	Employee Issues	Documents non-legal issues brought by or concerning company employees, such as complaints or internal disciplinary matters. Includes correspondence, investigation notes, reports, findings, and determinations.	Human Resources Manager; Supervisor	After Resolved + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03035.0	Human Resources	Employee Relocation	Documents process for relocating employees. Includes approval forms, invoices and other expense documentation, agreements, correspondence, tax equalization information, policy exceptions, and related records.	Human Resources Operations	All Tax Audits Completed + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03019.1	Human Resources	Employment Eligibility Verifications	Documents employee eligibility to work within the United States. Includes Form I-9, H-1B visa documentation, green card labor applications and notifications, TN and L-1A visa immigration and naturalization forms, correspondence, and related records.	Human Resources Manager; Employee Service Center	Employee Termination + 3 Years	None Permitted
03020.0	Human Resources	Grievances	Documents formal complaint and proceedings brought by an employee concerning alleged violation of collective bargaining or legal employment rights. Includes complaint, investigation, mediation, arbitration, determination, appeal, and related records.	Location	Labor Union Grievances: After Settled + 10 Years; Other Grievances: After Settled + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03402.0	Human Resources	Job Catalog	Documents approved positions within the company. Includes position number, name, and description.	Global Compensation & Benefits	After Superseded	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03205.0	Human Resources	Labor Relations - Bids and Awards	Documents union bid and award process for covered positions. Includes seniority rosters, bids, awards, and related records.	Human Resource Manager; Location	Seniority Rosters: After Superseded + 2 Years; Other Records: After Position Awarded + 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
03024.0	Human Resources	Labor Relations - Collective Bargaining Campaigns	Documents strategy adopted during collective bargaining agreement campaigns. Includes worksheets, cost analyses, campaign materials, presentations, correspondence, benefits offerings such as health & welfare, and related records.	Employee Relations	Contract Obligations Cease + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03025.0	Human Resources	Labor Relations - Collective Bargaining Negotiations	Documents negotiations over collective bargaining agreements. Includes correspondence, meeting minutes, analyses of issues, position statements, benefit cost information, draft agreement language, and related records. Note: For official union agreements, see "Contracts and Agreements - Collective Bargaining".	Employee Relations; Location	Contract Obligations Cease + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03045.0	Human Resources	Labor Relations - Union Employee Notices	Documents mandatory work-related notices given to union employees per their union agreement. Includes facility shutdowns and other events affecting their work environment.	Location	Until Contract Obligations Cease Unless Retention Specified Per The Agreement	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03920.0	Human Resources	Manager's Employee Desk File	Documents manager's discussions with employees during one on ones, career development or disciplinary actions. Includes notes and other related records to assist manager in performance reviews and career discussions. Note: Any employee records that are deemed to be part of the "Official Employee Record" should be sent to the Human Resources Manager for inclusion in the employee's "Official Employee Record".	Department	No Longer Than Termination Or Transfer + 1 Year	None Permitted

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
03030.0	Human Resources	Official Employee Record	Documents employee history with the company. Includes application, offer letter and hiring documents, employment contracts and agreements, personnel change notices, compensation history, certifications, awards, letters of commendation, skills testing results, performance evaluations, termination checklists and releases, and related records. Note: For a complete listing of records considered to be part of the "Official Employee Record", see Human Resources Policy 405 - Employee Records Management.	Human Resources Manager; Global Compensation & Benefits	Employee Termination + 10 Years and Contract Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03029.1	Human Resources	Payroll Deductions	Documents authorizations and court ordered withholdings for payroll deductions. Includes direct deposit, tax withholdings, loans, promissory notes, child support levies, garnishments and liens, authorization forms, status changes, W-4s, and related records.	Human Resources Service Center; Location	Loans, Liens, and Garnishments: Final Payment + 7 Years; Other Records: After Authorization Superseded / Employee Termination + 4 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03220.0	Human Resources	Personnel Strategy Planning	Contains people reviews, succession planning, and related records.	Human Resources; Department	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03401.0	Human Resources	Position Descriptions	Contains description of positions. Includes requirements, responsibilities, duties, and other details on positions.	Human Resources; Compensation; Department Issuing Job Description	After Superseded / Position Abolished + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03033.0	Human Resources	Recruitment Program	Documents efforts made to advertise and recruit for open positions. Includes job postings, advertisements, diversity outreach letters, correspondence, and related records.	Human Resources Manager	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03414.0	Human Resources	Recruitment Program - Background Checks	Contains reference, credit, and other background checks. Includes reports, notes, correspondence, and related records.	Human Resources Manager	3 Years	None Permitted
03413.0	Human Resources	Recruitment Program - Hiring and Selection	Documents employee hiring and selection process for open positions. Includes applications, resumes, testing materials, interview logs, and related records.	Human Resources Manager	Records For Successful Candidates: Move To "Official Employee Record"; Records For Other Applicants: After Decision Made + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
03034.0	Human Resources	Regulatory Reporting - Equal Employment Opportunity Commission (EEOC)	Documents required reporting to the Equal Employment Opportunity Commission (EEOC). Includes EEO-1 and VETS-100 reports.	Diversity & Compliance; Location	After Report Issued + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03038.0	Human Resources	Time Reporting	Documents employee time reporting. Includes time sheets, time tickets, and other records detailing hours worked. Note: For time sheets and related records for temporary employees, contractors, consultants, and other service providers, see "Accounts Payable".	Human Resources Service Center; Entry Location	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03026.0	Human Resources	Training - Management Development Program	Documents development of courses used to train employees on management and leadership skills. Includes manuals, guides, employee interviews, instructional content, and related records.	Staffing & Development	After Superseded / No Longer Used + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03938.0	Human Resources	Training - Non-Regulated	Documents company training not mandated by law or regulation. Includes training schedules, attendance sheets, course materials, and related records.	Office(s) Responsible for Development / Delivery and / or Attendance Tracking	Course Materials: After Superseded Or Outdated + 3 Years; Other Records: 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
03040.0	Human Resources	Training - Regulated	Documents company training mandated by law or regulation, such as antitrust, safety, equipment operation, hazardous materials handling, and others. Includes training schedules, attendance sheets, course materials, certificates of completion, and related records.	Office(s) Responsible for Development / Delivery and / or Attendance Tracking	Certificates Of Completion: Employee Termination + 6 Years; Course Materials: After Superseded Or Outdated + 6 Years; Other Records: 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
05100.0	Information Technology	Asset Management - Information Technology Equipment	Documents life cycle of computer and other information technology equipment. Includes make, model, serial number, location, and other information.	Information Technology	After Equipment Disposed Of + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
05030.0	Information Technology	Computer System Application Documentation	Documents purchase or in-house creation of applications, including implementation and removal / disposal of computer software from company systems. Includes purchasing, installation, software keys, source code / program listing, application design documentation, job control language, upgrades, modifications, removals / disposition, and other related records.	Information Technology	Financial Applications Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Data Is Migrated Or Purged and Documentation Is No Longer Relevant To Existing Data, Or The Application Is Permanently Retired	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
05009.0	Information Technology	Hardware Documentation	Documents purchase, implementation, and disposal of computer hardware used in company systems. Includes warranties, operating manuals and documentation, installation configurations into system architecture, inspection, maintenance, repair, disposition, and other related records.	Information Technology	Architecture, Configurations, and Documentation For Systems Supporting Tax Audits: All Tax Audits Completed; Other Records: After Hardware Disposed Of + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
05010.1	Information Technology	Information Technology Standards and Processes	Documents hardware and software standards and related processes used by the company. Includes quality assurance, design, review, support, process flow diagrams, and other related records.	Information Technology	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
05008.0	Information Technology	Internet Domain Names and Addresses	Documents the management of the company's domain names and addresses. Includes names, addresses, host servers, registrations, renewals, and other related records.	Information Technology	After Registration Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
05905.0	Information Technology	Project Management - Information Systems	Contains all project management documentation supporting a new application or enhancements to an existing application. Includes project delivery process (PDP) documentation, business requirements and analysis, project plans, work plans, change requests, and other related records.	Project Manager	Financial Programs Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Data Is Migrated Or Purged and Documentation Is No Longer Relevant To Existing Data, Or The Application Is Permanently Retired.	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
05014.0	Information Technology	Software Management and Licensing	Documents the use of software in the company (such as those on the desktop, enterprise, server, third party tools, and mobile applications) to ensure system compatibility and compliance with license and copyright provisions. Includes software evaluations, compatibility testing, software licenses, site licenses, and other related records.	Information Technology; Location	Financial Programs Holding Information Needed For Open Tax Audits: All Tax Audits Completed and License Expired + 6 Years / Application No Longer Used; Other Records: License Expired + 6 Years / Application No Longer Used	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
05015.0	Information Technology	System Monitoring Activities	Documents electronic files or automated logs created to monitor computer system activities. Includes operations, applications and database logs (such as internet usage or error logs), and other related records.	Information Technology; Office Monitoring Access	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
05016.0	Information Technology	System Table Maintenance	Documents the additions, deletions and changes of items in system tables.	Office Responsible for Table Maintenance	Master Data Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
05001.0	Information Technology	System User Access	Documents access provided to users. Includes security login information, name, user ID, date, system, and other related information.	Information Technology; Office Controlling Access	Network User Id: 99 Years; Other Records: Until Deleted Or Outdated	None Permitted
01039.0	Legal	Acquisitions and Sales - Real Property	Documents real estate acquisitions and sales. Includes abstracts, agreements, closing statements, deeds, easements, liens, promissory notes, mortgage documents, loan financing documents, amendments, addendums, notices of commencement, partitions, surveys, title insurance, transfers, sales, and other records documenting ownership or use.	Legal; IP Realty	Closing & Title Documents: Permanent; Abandoned Acquisitions / Sales Transactions: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01001.0	Legal	Advice and Counsel	Documents advice and counsel given by the Legal Department on matters affecting the company. Includes correspondence and supporting records.	Legal	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01058.0	Legal	Antitrust Oversight and Control	Documents antitrust oversight and control activities. Includes reports, studies, competitor contacts, correspondence, findings, actions taken, and related records.	Legal	6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01005.0	Legal	Business and Product Development Legal Oversight	Documents oversight of business and product development activities. Includes copies of sales and marketing analyses, market research, industry information, development information, marketing collateral, sales materials, and related records.	Legal	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01017.0	Legal	Compliance Program Development and Maintenance	Documents compliance program activities. Includes program goals and objectives, responsibility statements, certifications, and related records.	Office Responsible for Design, Implementation and / or Enforcement	Certifications: Until Superseded Or Outdated + 6 Years; Other Records: After Program Terminated + 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01055.0	Legal	Conflict of Interest Waivers	Documents waivers granted by the company to outside counsel. Includes waivers, correspondence, and related records.	Legal	After Waiver Terminated + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
01066.0	Legal	Contracts and Agreements	Contains agreements and contracts other than those specified in other areas of the Master Records Retention Schedule. Includes leases, renewals, amendments, change orders, correspondence, and other supporting records. Note: For employee related contracts and agreements, see "Official Employee Record".	Office Controlling Contractual Relationship	Environmental Or Hazardous Materials Remediation, Storage, Clean-Up, Or Other Services: Contract Obligations Cease + 50 Years; Other Records: Applicable Tax Audits Completed and Contract Obligations Cease	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01067.0	Legal	Contracts and Agreements - Collective Bargaining	Documents agreements with labor unions as part of the collective bargaining process.	Human Resources Manager	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01012.0	Legal	Contracts and Agreements - Improvements to Real Property	Contains contracts and agreements for design, construction, renovation, and improvements to company buildings and real estate. Includes contracts, agreements, renewals, amendments, correspondence, and supporting records.	Office Managing the Property	All Tax Audits Completed and Assets Depreciated & Disposed Of	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01023.0	Legal	Foreign Trade Barrier Matters	Documents trade barriers and other restrictions on international sales or exports. Includes language of barrier / regulation, reports, analyses, opinions, correspondence, and related records.	Legal	After Barrier / Requirement Removed + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01200.0	Legal	Helpline Cases	Documents complaints or issues received by the Helpline. Includes complainant's allegations, call notes, investigation, resolution, and related records. Note: This includes records and other data pertaining to breaches in security or allegations of fraud at company locations.	Ethics Office; Office Responsible for Investigation or Resolution	After Resolved + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01024.1	Legal	Insurance Claims	Documents liability and non-liability claims for reported incidents under the company's insurance policies. Includes loss reports and supporting records.	Legal; Global Risk Management	After Settled + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01061.0	Legal	Intellectual Property - Abandoned Trademark Applications	Documents abandoned registration of trademarks. Includes correspondence, opinions, applications, searches, and related records.	Legal	Application Abandoned + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
01063.0	Legal	Intellectual Property - Clearance Searches and Opinions	Documents searches and analysis of intellectual property rights of others in relation to company's activities, products, and processes. Includes correspondence, opinions, searches, and other related records.	Legal	Life Of Intellectual Property Rights + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01062.0	Legal	Intellectual Property - Common Law Trademarks	Documents company's use of its common law trademarks. Includes searches and other related records.	Legal	Date Trademark Use Discontinued + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01027.0	Legal	Intellectual Property - Copyrights	Contains copyright applications and registrations. Includes correspondence, searches, and other related records.	Legal	After Copyright Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01029.0	Legal	Intellectual Property - Patents	Documents patent filings and related administrative proceedings such as oppositions, re-examinations or interferences. Includes applications, fee transmittals, specifications, correspondence, opinions, oaths, declarations, and related records.	Legal	After Patent Application Abandoned, Or Last Foreign Or U.S. Counterpart Lapsed Or Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01030.0	Legal	Intellectual Property - Registered Trademarks	Documents registering of company trademarks. Includes registrations, filings, certifications, specimens, renewals, and supporting records.	Legal	Life of Registration and / or Registration Cancelled + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01064.0	Legal	Intellectual Property - Trademark Searches	Documents trademark searches conducted. Includes search records, specimens, and right-to-use opinions.	Legal	After Search Completed + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01065.0	Legal	Intellectual Property - Unfiled Records of Inventions	Documents records of inventions that have not been filed. Includes correspondence, opinions, searches, and related records.	Legal	200 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01032.0	Legal	Legal Proceedings	Documents litigation and claims other than those specified in other areas of the Master Records Retention Schedule. Includes notices, statements, pleadings, judgments, opinions, and related records. Note: For the release and / or settlement agreement, see "Releases and Settlements".	Legal (Managing Attorney)	After Resolved Or No Activity + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01072.0	Legal	Legal Proceedings - Asbestos	Contains records related to asbestos litigation and claims cases.	Legal (Managing Attorney)	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
01033.0	Legal	Legal Proceedings - Attachments and Garnishments	Contains court orders, change orders, withholding support for employee attachments and garnishments.	Legal	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01073.0	Legal	Legal Proceedings - Remediation	Documents remediation related to Comprehensive Environmental Response Compensation and Liability Act (CERCLA / Superfund), Resource Conservation and Recovery Act (RCRA), or other remediation and state equivalent regulations. Includes settlement agreements and other related records.	Legal (Managing Attorney)	Permanent	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01070.0	Legal	Legal Proceedings - Service of Process	Contains summonses or other documents issued by a court or administrative agency served on the company or its registered agent for service of process.	Legal	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01059.0	Legal	Legal Proceedings - Third Party Subpoenas & Other Information Requests	Documents orders, subpoenas, and other requests received from third parties. Includes order, subpoena, response, correspondence, and related records.	Legal	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01056.0	Legal	Licenses, Registrations and Certifications – Federal Communications Commission (FCC)	Contains license applications, registrations and certifications approved by the Federal Communications Commission (FCC).	Office Managing the License	Duration of License	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01008.0	Legal	Policies Acknowledgements	Contains forms signed by company employees documenting their acknowledgement and / or agreement to abide by various company policies or standards of behavior.	Office Controlling Process	Until Superseded Or Outdated + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01038.0	Legal	Political Action Committee Filings	Documents activities of the company's Political Action Committee (PAC). Includes registration, reporting, and related records.	Government Relations	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01075.0	Legal	Product Liability Warranty Claims	Documents warranty claims received on the company's products. Includes claim, investigation, and related records. Note: For the release and / or settlement agreement, see "Releases and Settlements".	Legal	Masonite Claims: Warranty Period Or No Longer Than After Settled + 18 Years; Other Claims: After Settled or Released + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
01205.0	Legal	Regulatory Audits - External	Documents external audits, examinations, and reviews from regulatory authorities such as the Securities and Exchange Commission (SEC), Department of Energy (DOE), Department of Transportation (DOT), Office of Federal Contract Compliance Programs (OFCCP), Environmental Protection Agency (EPA), Occupational Safety & Health Administration (OSHA), and other regulatory agencies. Includes questionnaires received from auditors, responses to auditors, action plans if applicable, and related records.	Legal	No Longer Than After Completed + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01041.0	Legal	Regulatory Communications	Documents communications with regulators on various compliance matters. Includes inquiries from regulators, the company's responses, and supporting documentation.	Office Communicating with Regulator	Non-Time Limited Regulatory Settlements, Obligations and / or Undertakings: Permanent; Other Records: After Superseded + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01042.0	Legal	Regulatory Reporting	Documents regulatory reporting other than those specified in other areas of the Master Records Retention Schedule (such as Medicare Reporting). Includes workpapers, data files, and related records.	Office Responsible for Submission	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01069.0	Legal	Releases and Settlements	Contains releases and settlements, other than those specified in other areas of the Master Records Retention Schedule, that document the release of the company from future obligations and / or terms to settle a legal matter.	Legal	75 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01057.0	Legal	Right of Ways and Easements	Documents the legal rights enabling the company or another entity to transport goods over a particular land or property. Includes easements, agreements, right-of-ways, correspondence, and related records.	Global Supply Chain	After Revoked or Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
01068.0	Legal	Transportation Claims - Loss / Damage	Documents transportation and loss damage claims. Includes findings, damaged load information, correspondence, credits, adjustments, write-offs, and related records.	Global Supply Chain	All Tax Audits Completed	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
01074.0	Legal	Vehicle Titles	Contains forms issued by the states' Department of Motor Vehicles (DMV) establishing the company as the legal owner of a vehicle. Includes related records. Note: For registration records, see "Vehicle Records".	Vehicle Location	Until Vehicle Disposed Of Or Sold	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08103.0	Operations	Aircraft Operations and Maintenance	Documents the management of company aircraft. Includes titles, registrations, logbooks, aircraft engine records, inspections, maintenance records, incident reports, flight plans, and related records.	Aviation	After Aircraft Disposed Of + 1 Year Or Transfer To New Owner	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08104.0	Operations	Bids and Proposals	Documents bids issued by the company for products and services and responses received. Includes bids, Requests for Information (RFI) / Requests for Proposals (RFP) issued, responses, evaluations, correspondence, and related records.	Global Supply Chain; Office Responsible for Bid Process	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08125.0	Operations	Bills of Lading	Documents delivery of materials and products within the United States. Includes date, transporter, contents, destination, and related information. Note: For international destinations, see "Import / Export Control".	Shipping Location	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08130.0	Operations	Building and Grounds Maintenance	Documents janitorial, grounds keeping, and other facility work performed on company properties. Includes work orders, statement of repairs or work completed, and related records.	Location	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08230.0	Operations	Business Continuity	Documents business continuity and disaster planning. Includes actual plans, testing, and other related records.	Location or Department	Until Superseded	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08113.0	Operations	Business Planning	Contains business plans for operations. Includes strategy, sales, marketing, staffing, and related records.	Office Preparing the Plan	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08105.0	Operations	Certificates of Insurance - Contractors	Contains certificates of insurance for the parties retained to provide contracted services. Includes coverage in effect, dates of inception and expiration, limits, and named insured.	Office Controlling Contractual Relationship	Life Of Relationship With Contractor + 20 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
08106.0	Operations	Contract and Lease Management	Documents the management of the terms and conditions of the company's contracts and leases for services, equipment, and real property. Includes copies of contracts / agreements, reports, correspondence, and other related records.	Global Supply Chain; Office Managing Lease	Contract Obligations Cease + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08001.0	Operations	Crop Management	Documents the planning, planting, monitoring and harvesting of trees in the company's research plots. Includes data measurements, analyses, and other related records.	Location	No Longer Than After Harvest + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08107.0	Operations	Distribution Warehouse Management	Documents administrative oversight of the operations at the warehouses used to receive and ship company products.	Global Supply Chain	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08110.1	Operations	Driver and Vehicle Inspections	Contains required Department of Transportation (DOT) inspections and remedial actions taken. Includes commercial driver's inspections of vehicle and roadside inspections.	Vehicle Location	Roadside Inspections: 1 Year; Driver's Inspections: 3 Months	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08108.0	Operations	Driver Logs	Documents commercial driver's hours of service for Department of Transportation (DOT) reporting. Includes driver's logs that contain the name of the driver, dates, times, locations, and related information.	Vehicle Location	3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08109.0	Operations	Driver Qualification Records	Documents drivers' ability or qualifications to drive a commercial motor vehicle.	Vehicle Location	Employee Termination + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08128.0	Operations	Equipment Maintenance	Documents repair and maintenance of equipment owned or leased by the company. Includes routine maintenance, preventive maintenance, scheduling, repairs, calibrations, inspections, analysis reports, logs, and other related records.	Location	Maintenance, Inspections, and Repair Records: Life Of Equipment + 10 Years; Analysis Reports and Logs: No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08003.0	Operations	Facility and Equipment Plans and Drawings	Documents design of company facilities and equipment. Includes plans and drawings, specifications, schematics, and other related records.	Project Manager	Facilities: After Sold, Ownership Transferred, Or Demolished + 6 Years; Equipment: After Disposition + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
08005.0	Operations	Facility Plan	Documents planned changes in technology, equipment, or space to meet the long-range needs of the facility or operation.	Location	Until Outdated + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08126.0	Operations	Import / Export Control	Contains required import / export documentation. Includes applications, authorizations, inventories, correspondence, and related records.	Shipping and / or Receiving Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08240.0	Operations	Internal Audits	Documents internal audits performed on company operations, other than those specified in other areas of the Master Records Retention Schedule. Includes reports, testing, peer reviews, self assessments, and related records.	Department Performing Audit	Financial Audits: 7 Years; Other Audits: Until Superseded or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08114.0	Operations	Inventory Reconciliation	Documents amount of goods, materials, equipment and other company property. Includes inventory reports, cycle counts, reconciliations, and related records.	Office Managing Inventory	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08006.0	Operations	Lot Samples	Contains specimens and samples used to test the quality of the company's products during production.	Location Conducting Test	No Longer Than 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08115.0	Operations	Materials and Supplies Management	Documents requisition, receipt, consumption, and distribution of materials from company storerooms and locations. Includes requisitions, transfers, inventories, tallies, scale tickets, scrap tickets, weights, and related records.	Office Managing Materials and / or Supplies	4 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08250.0	Operations	Pilot Qualification Records	Documents pilot's qualification to fly an aircraft. Includes records required by the Federal Aviation Administration (FAA) such as pilot proficiency checks, training, certifications, and related records.	Aviation	Employee Termination + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08220.0	Operations	Product Stewardship and Certification	Documents information provided to customers on annual certification of products and chemical constituents. Includes test results, life cycle assessments, certificates, approvals, attestations, and related records.	Sustainability	Test Results, Assessments, Certifications, Attestations, and Approvals: After Superseded Or Outdated, + 6 Years; Other Records: 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
08127.0	Operations	Production Management	Documents production activities for management purposes. Includes plans, schedules, downtime reporting, trim sheets, production orders, and other related records.	Production Location; Planner	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08906.0	Operations	Project Management - Capital Projects	Documents capital improvement and renovation projects. Includes plans, drawings, studies, analyses, reports, approvals, cost estimates, project workpapers, copies of purchase orders and other accounts payable documentation, payments, and related records.	Project Manager	Completed Projects: All Tax Audits Completed and Sold Or Disposed Of; Abandoned Projects: No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08924.0	Operations	Project Management - Process Improvement Projects	Documents operational or productivity improvements. Includes the project plans, meeting minutes, deliverables, and other related records.	Project Manager	No Longer Than After Project Completed + 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08009.0	Operations	Quality Audits	Contains reports and documentation related to the audits of the company's quality assurance processes and systems.	Location Audited	7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08010.0	Operations	Quality Certification	Documents measures taken by a plant to meet the quality requirements determined by the International Organization for Standardization (ISO) or other external standards organizations.	Location	Life of Certification + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08011.0	Operations	Quality Control	Documents quality controls used on company products. Includes material and process assessments, tests, quality audits, certificates of analysis (COA), and related records.	Location Conducting Test	After Warranty Period Expired + 6 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08129.0	Operations	Railroad Records	Contains inspections, test and repair records, dispatch records, and hours of service records.	Operating Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08012.0	Operations	Right of Entry Permits and Licenses	Documents permission given to the public and others to access company property for social or recreational purposes. Includes applications, licenses and permits issued, and supporting records.	Office Issuing Permit	After Expired + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
08225.0	Operations	Sustainable Forestry Initiatives and Chain of Custody Management	Documents activities to meet the Sustainable Forestry Initiative, ISO 14001, and other product stewardship certifications and standards. Includes certifications, audits, monitoring, and related records.	Sustainability	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08120.0	Operations	Transportation Carriers Management	Contains rate schedules, performance reviews, and other records used to manage the relationship with the company's transportation carriers.	Office Managing Relationship	No Longer Than Life Of Relationship + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08121.0	Operations	Transportation Planning & Coordination	Contains data and records used to plan and coordinate the movement of products via truck, parcel, rail, and ocean shipments.	Global Supply Chain	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08123.0	Operations	Vehicle Records	Contains registration, maintenance, inspections, and repair records of the company-controlled motor vehicles. Includes dispatcher's logs, registers, gasoline logs, and other related records.	Vehicle Location	Registrations: After Expired + 3 Years; Other Records: 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04403.0	Sales/Marketing	Competitive Intelligence	Documents intelligence gathered on competitors providing similar products and services. Includes reports, studies, analyses, trends, forecasts, and related records.	Marketing	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04405.0	Sales/Marketing	Corporate Brand Management	Documents the development and usage of the names, signs or symbols that uniquely identify the company's products and services.	Marketing	After Last Use + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04505.0	Sales/Marketing	Customer Accounts Management	Documents customer-specific product requirements. Includes specifications, sample requests, technical records, job bags, and related information.	Sales; Technology	No Longer Than Life of Relationship + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04404.0	Sales/Marketing	Customer Complaints	Contains customer complaints concerning company products and services. Includes complaints, company responses, and other related records.	Office Resolving the Complaint	External Consumer Products Complaints: After Resolved + 4 Years; Other Complaints: After Resolved + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04407.0	Sales/Marketing	Market Research	Documents market research done on products, services, and customers. Includes reports, studies, analyses, surveys, and related records.	Marketing	Until Superseded Or Outdated + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
04500.0	Sales/Marketing	Marketing and Advertising	Documents marketing campaigns and advertising of company products and services. Includes campaign development, reports, requests, studies, job files and jackets with specifications, advertisements, marketing collateral, surveys, and related records.	Marketing	After Last Use + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04411.0	Sales/Marketing	Pricing	Documents development of general and customer-specific pricing for products and services. Includes price surveys, price lists, price rules, price models, price deviation approvals, and related records.	Office Responsible for Setting Prices	Until Superseded Or Outdated + 2 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04412.0	Sales/Marketing	Product Development and Management	Documents development of product and service lines. Includes concepts, ideas, analyses, specifications, change authorizations, information sheets, implementation planning, commercialization rollouts, and related records.	Marketing; Technology	Life Of Product Line + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04413.0	Sales/Marketing	Prospect Management	Contains identification and qualification of prospective customers for company goods and services.	Office Managing Leads	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04414.0	Sales/Marketing	Sales Account Management	Contains correspondence, quotations, proposals, and other records used to target and manage customer sales accounts.	Sales	Customers: No Longer Than After Last Use + 6 Years; Unsold Prospects: No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04415.0	Sales/Marketing	Sales Audits	Documents internal and external audits of pricing documents, invoices, and related records. Includes audits completed by the company, its customers, or third parties on behalf of its customers.	Office Coordinating Audit	Until Superseded Or Outdated	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04417.0	Sales/Marketing	Sales Orders	Documents sales orders submitted for the company's products and services. Includes purchase requests, confirmations, proofs, order updates, inquiries, and related records.	Sales	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04419.0	Sales/Marketing	Sales Promotions	Documents sales promotions targeted to customers, sales representatives, or distribution channel members. Includes plans, analyses, and other related records.	Sales	Until Promotion Expires	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
07001.0	Technology	Conservation Management	Documents planning and reporting to support conservation management. Includes tracking requirements under the Endangered Species Act and other records.	Reporting Location	10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Copies Version Retention
07003.0	Technology	Equipment Information	Contains records pertaining to equipment and parts installed in the manufacturing locations. Includes manuals, catalogs, specification sheets, warranties, and other records.	Location	Life of Equipment + 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
07007.0	Technology	Manufacturing Equipment and Process Standards	Contains manufacturing equipment and process standards in force at the company.	Technology	Until Superseded Or Outdated + 15 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
07006.0	Technology	Manufacturing Instructions	Contains descriptions of the various manufacturing processes utilized in the company's plants (such as sequence of operations, procedure controls points, and monitoring methods). Includes data reporting methods, acceptance numbers, corrective action plans for nonconformity, and other related records.	Technology	Until Superseded Or Outdated + 15 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
07015.0	Technology	Manufacturing Materials Specifications	Documents specifications for the raw materials used in the production of the company's products.	Technology	Until Superseded Or Outdated + 15 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
07014.0	Technology	Product and Process Testing	Documents testing done on the company's products and processes. Includes tests and measurements, results, analyses, reports, and related records.	Technology	No Longer Than 10 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
07010.0	Technology	Project Management - Technology Projects	Documents the projects undertaken to develop or improve new products or services, enhance production processes, and improve reliability. Includes samples, models, statistical analysis, memos, studies, computer models, raw data specifications, and other related records.	Technology Project Manager	Approved: After Project Completed + 15 Years; Non-Approved: No Longer Than After Final Decision + 7 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
07025.0	Technology	Research and Laboratory Notebooks	Documents scientific, technical, and experimental work completed concerning the company's research, development, and process improvement activities. Includes laboratory notebooks, test results, reports, technical research data, and supporting records.	Technology	200 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
ADM-100	Administrative	Administrative Support - Calendars and Day Planning	Contains calendars and day planning information. Includes date, time, event description, and related information.	Department	No longer than 2 years	Business Use
ADM-101	Administrative	Administrative Support - Contacts and Mailing Lists	Contains internal and external contact data, directories, mailing and distribution lists, and related information.	Department	Until superseded or outdated	Business Use
ADM-102	Administrative	Administrative Support - Correspondence	Contains general and routine correspondence that does not set policy or establish procedures. Includes transmittals (i.e., fax cover sheets), acknowledgments, general requests for information or publications, announcements, notices, reading files, and related routine memos.	Department	No longer than 1 year	Business Use
ADM-103	Administrative	Administrative Support - Travel Planning	Contains itineraries, confirmations, and other travel planning records.	Department	No longer than 5 years	Business Use
ADM-104	Administrative	Buildings and Grounds Security and Scale House Monitoring	Documents monitoring of access to company premises and video monitoring of scale house transactions for truck and rail during both the inbound and outbound weighing processes to assist with supplier fraud prevention. Includes visitor logs, parking, surveillance digital files, digital video recording files, security badges, and other records. Note: For records documenting the controls placed on computer system access see "System User Access" (ITL-609).	Location	Security badges: Until expired; Other records: No longer than 5 years	Business Use
ADM-105	Administrative	Internal Operational / Management Reporting	Contains internal reporting not specified in other areas of the Master Records Retention Schedule. Includes management reporting, balanced scorecards, department goals and objectives, headcount analysis and reports, trending analysis, crew scheduling, and any other reporting for operational analysis. Note: For the official financial, sales, and planning reports maintained by Finance see "Financial Analyses and Reporting" (FIN-414) and "Regulatory Reporting" (LGL-734) for reports supporting regulatory filings.	Office preparing report	No longer than 10 years	Business Use
ADM-106	Administrative	Meeting Management & Participation	Documents company committees and internal meetings, except for those related to the Board of Directors and those specified in other areas of the Master Records Retention Schedule. Includes agenda, minutes, exhibits, notes, and related records.	Meeting chair	No longer than 5 years	Business Use
ADM-107	Administrative	Policies, Procedures, Guidelines and Processes	Contains internally-developed policies, procedures, guidelines, and processes. Includes records supporting their development.	Office of issuance	Until superseded or outdated	Business Use

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Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
ADM-108	Administrative	Presentations and Speeches	Contains speeches and presentations given to internal and external audiences by company personnel. Includes presentation slides, scripts, notes, and related records.	Office delivering the presentation / speech	Until superseded or outdated	Business Use
ADM-109	Administrative	Reference Materials	Contains working files and reference materials used to track, locate, retrieve, or provide information. Includes filing lists, award lists, logs, published resources, research, articles, office equipment and personal computing reference materials, regulatory and industry information, vendor information files, non-IT asset tracking, transmittal forms describing records sent to storage, permanent record withdrawals, record destruction notifications, and certificates of destruction from third party service providers, and other reference materials used for business purposes.	Department	Until superseded or no longer needed and review regularly for disposal	Business Use
ADM-110	Administrative	Service Requests	Documents requests for services such as information technology, facilities and maintenance, technical services, mailings, or other internal services. Includes request forms, work orders, actions taken, resolutions, and any follow-up with the requester.	Department processing request	No longer than 3 years	Business Use
ADM-111	Administrative	Surveys	Documents internal and external surveys, questionnaires, and studies such as customer, employee, salary, mystery shopper, general job demand, and benchmarking. Includes questions, results, and interpretations.	Office conducting survey	Until superseded or outdated	Business Use
ADM-112	Administrative	Image Management	Documents digital and analog image assets created by or for the company and used to document company assets and events. Includes photos, negatives, slides, transparencies, videos, and digital versions.	Office responsible for controlling image access	Until superseded or outdated	Business Use
COR-200	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Agreements and Closing Documents	Contains agreement and required closing documents. Includes main letter of intent, purchase sales, and related ancillary agreements, applications, opinions, Securities & Exchange Commission (SEC) registration statements, regulatory filings, final agreement, post-closing deliverables and related records.	Corporate Secretary	Permanent	Highly Restricted

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Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
COR-201	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Due Diligence	Contains documents generated and gathered during the course of due diligence for proposed mergers, sales, acquisitions, and joint ventures. Includes reports, correspondence, analyses, and other records used to evaluate the proposed transaction. See also "Purchase, Sales, Leases, Sublease, Demolitions, Improvements, and other Real Estate transactions – Real Property " (LGL-700) for records documenting real property acquisitions and sales; "Acquisitions, Mergers, and Joint Ventures, Recapitalization and Divestitures - Financial Analysis" (FIN-403) for records used to assess and support the transactions from a financial perspective and "Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Agreements and Closing Documents" (COR-200) for agreements and closing documents. Note: For successful transactions, records received from the other party that become official records of International Paper should be reclassified under the appropriate records series.	Offices involved in due diligence process	Successful transaction: After agreement executed; Transaction not completed: Follow terms of agreement	Highly Restricted
COR-202	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Transition Services	Documents services provided to non-International Paper entities during transaction transitions. Includes copy of contract, licenses and certifications, reports, correspondence, timesheets, and related records. See also "Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Agreements and Closing Documents" (COR-200) for related contracts.	Offices involved in transitional process	Follow terms of agreement	Highly Restricted
COR-203	Corporate	Charitable Contributions	Documents charitable contributions made by a location or department. Includes applications, correspondence, donation description, authorizations, copy of documentation sent to Accounts Payable, property appraisals, donee acknowledgements, donee and/or appraiser certifications, and related records.	Office approving contribution	All tax audits completed	Highly Restricted
COR-204	Corporate	Communications - External	Contains external communications concerning issues affecting the company and matters of interest to the public. Includes press releases, policy statements, responses to questions from the public or the media, and related records.	Office issuing the communication	Until superseded or outdated	Public
COR-205	Corporate	Communications - Internal	Contains internal company general communications to employees concerning various company programs. Includes news and information, correspondence, and other records.	Office issuing the communication	Until superseded or outdated	Business Use
COR-206	Corporate	Company Performance Reporting	Documents financial results and business plans communicated to analysts, rating agencies, investors, and other external parties. Includes reports, presentations, workpapers, and related records.	Investor Relations	6 years	Highly Restricted

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Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
COR-207	Corporate	Compensation - Board of Directors	Documents development, participation, implementation, and administration of the company's Board of Directors' compensation plan. Includes plan design, plan documents, fees and expenses documentation, payouts, and related records.	Corporate Secretary; Global Compensation & Benefits	15 years	Highly Restricted
COR-208	Corporate	Board of Directors and Officers - Selection and Retention	Documents the selection and retention of Board of Directors and the appointment of officers. Includes backgrounds of individuals who have served on the Board of Directors or as company officers.	Corporate Secretary	Permanent	Highly Restricted
COR-209	Corporate	Board of Directors and Committee Records	Documents actions taken by the Board of Directors and Committees of the Board for International Paper and its subsidiaries. Includes pre-read materials, agendas, minutes, exhibits, appointments and resignations, and related records.	Corporate Secretary (International Paper and US subsidiaries); Responsible party (Non-US subsidiaries)	Permanent	Highly Restricted
COR-210	Corporate	Event Management	Documents charitable, political, corporate, and community programs and events coordinated by the company. Includes lists of participants, program / event information, results, and other records.	Office managing the event	No longer than 5 years	Business Use
COR-211	Corporate	Corporate Organization and Ownership	Contains articles of incorporation, bylaws, charters, and other records documenting the formation, structure, reorganization, and dissolution of the company and its subsidiaries. Includes regulatory applications and approvals, registration statements, trade names (such as doing business as, also known as), and other supporting records.	Corporate Secretary	Permanent	Business Use
COR-212	Corporate	Delegation of Authority	Documents the internal delegation and distribution of authority within the company. Includes records identifying persons authorized to sign certain documents (such as contracts), approve payments, or take other action on behalf of the company.	Office controlling the delegation authority	Until superseded or outdated	Business Use
COR-213	Corporate	Executive Biographies	Biographical information sheet on key executives and officers. Includes photos, assignment history, and related records.	Communications; Global Compensation & Benefits	Employee termination + 10 years	Business Use
COR-214	Corporate	Media Coverage	Documents externally generated media coverage of company activities. Includes newspaper and journal articles, photographs, videos, and related records.	Communications	No longer than 5 years	Public
COR-215	Corporate	Public Information Requests	Documents requests for information received from ratings agencies, investors, analysts, and the public. Includes correspondence, company publications, and related records.	Investor Relations	5 years	Public

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Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
COR-216	Corporate	State Business Licenses	Documents the company's right to conduct business in each state. Includes applications and filing packages, registrations, licenses, certifications, records of the registered process agents authorized to act on behalf of the company, and related records.	Corporate Secretary	Registered process agents records: 10 years; Other records: Permanent	Business Use
COR-217	Corporate	Stock Exchange Listings	Documents stock exchange listings including the New York Stock Exchange (NYSE). Includes application, listing agreement, trade volume, market value of shares, and other records supporting the continued listing on the exchange.	Corporate Secretary	Permanent	Business Use
COR-218	Corporate	Stockholder Records - Shareholder Listings	Contains annual shareholder listing.	Corporate Secretary	6 years	Business Use
COR-219	Corporate	Foundation Management	Documents oversight and administration of the Foundation. Includes annual reports, analyses, expenditures, registrations, tax reporting, and related records.	Foundation	All tax audits completed; Annual Reports: Permanent; Tax Return: Permanent	Business Use
COR-220	Corporate	Industry Reporting	Documents information provided to industry and trade associations. Contains reports, studies, papers, and other records covering market share, sales, production, pricing, and related information.	Office submitting report	5 years	Business Use
COR-221	Corporate	Legislative Tracking	Documents tracking of legislation impacting the company. Includes draft bills, amendments, background material, trade associated reports, and related records.	Government Relations; Legal	No longer than 6 years	Business Use
COR-222	Corporate	Lobbying Activities	Documents issues and actions made to influence decisions of legislators, government agencies, constituents, and advocacy groups. Includes position papers, letters, studies, committee hearings, lobbying memo, lobby reports and related records.	Government Relations; Legal; Tax	Tax Report: All tax audits completed; All other: Until superseded or outdated + 5 years	Business Use
COR-223	Corporate	Political Action Committee Management	Documents committee organized to raise funds in support of candidates or causes of interest to the company. Includes Political Action Committee (PAC) Board meetings and approval information, committee information, receipts, bank account statements and reconciliations, candidate letters, check requests, disbursements, and related records. See also "Political Action Committee Filings" (COR-224) for the official filings.	Government Relations; Legal	All tax audits completed	Business Use
COR-224	Corporate	Political Action Committee Filings	Documents activities of the company's Political Action Committee (PAC). Includes registration, reporting, and related records.	Government Relations	Filing + 3 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
COR-225	Corporate	Stockholder Records	Documents company stock issuance and program. Includes annual reports, stock transfers, stock cancellations, dividend distributions, proxy and voting records, and related records. See also "Stockholder Records - Shareholder Listings" (COR-218) for ownership records of individual shareholders.	Corporate Secretary; Corporate Accounting; Global Compensation & Benefits	Proxy and Voting Records: 6 years; Other records: Permanent	Business Use
COR-226	Corporate	Corporate Business Planning	Contains Corporate strategic plans, operating plans, and strategic studies at the enterprise level.	Corporate Secretary; Planning & Analysis	15 years	Highly Restricted
EHS-300	Environment/Health/Safety	Audits and Assessments - Internal - Environment, Health & Safety	Documents internal audit reports and assessments on compliance with environmental, safety, and health requirements such as health and safety audits, internal assessments including key elements survey (KES), risk management plans, process safety management (PSM), Contractor Pre-Job Safety Assessment (PJSA), process hazard analysis (PHA), and others. Includes reports, workpapers, corrective action plans, supporting documentation, and related records. See also "Regulatory Audits - External" (LGL-732) for audits conducted by external parties such as the Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA)	KES, PJSA - Location; PSM, PHA - Corporate EHS; Area that governs the audit	Last two PSM Audits: Issue date + 6 years; PJSA: 90 days; Contractor audits, assessments and evaluations: 6 months; EHS Work Plan: 2 years; Internal assessments: Until superseded; PHA - For the life of the process; Other audits and records: After audit issued / correction plan completed + 5 years	Restricted
EHS-301	Environment/Health/Safety	Consent Orders, Citations, and Notices of Violations (NOVs)	Documents compliance with citations, consent orders, agreements, warnings, and notices of violations received from government environmental, safety, and health inspectors for violations of environmental, safety, and health regulations (including those from the Environmental Protection Agency (EPA), Occupational Safety & Health Administration (OSHA), and Department of Transportation (DOT)), fire marshals, and other state or local agency inspectors. Includes consent orders, agreements, citations, notices, assessments, corrective action plans, response and remediation documentation, correspondence, and related records.	Location	Consent orders and agreements: After resolved and obligations cease + 10 years; Other records: After resolved + 5 years	Business Use
EHS-302	Environment/Health/Safety	Emergency Response and Prevention Plans	Contains Storm Water Pollution Prevention (SWPP), Spill Prevention Control and Countermeasure (SPCC), and other environmental and safety / accident prevention plans such as those for fire and natural disaster. Includes plans, risk assessments, worst case scenarios, and related records.	Location	Until superseded or as specified by permit, license, law, or regulation requirements	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
EHS-303	Environment/Health/Safety	Environmental and Hazardous Materials Program Management	Documents the management and administrative oversight of the company's environmental and hazardous materials programs. Includes program development records, regulatory compliance requirements, surveys, action plans, project oversight documentation, employee communications, and other related documentation.	Corporate Environment, Health & Safety; Location	Until superseded + 10 years	Business Use
EHS-304	Environment/Health/Safety	Environmental Monitoring and Testing	Documents required monitoring and testing for air and water quality, pollutant emissions, greenhouse gas emissions, equipment leaks, and other matters mandated by regulation, permit, agreement, or order. Includes performance tests, monitoring inspections, emission averaging, continuous flow measurements, reports, equipment calibrations, test results, strip chart recordings, and related records.	Location	Until superseded + 10 years unless longer retention mandated by permit, agreement, order, or regulatory requirement; Initial performance test: Until superseded	Highly Restricted
EHS-305	Environment/Health/Safety	Environmental Credits Management	Documents management of the carbon off-set, greenhouse gas, wetlands, or other environmental credit programs. Includes applications, credits, purchase and sale documentation, invoices and payments, inventory, audits, reports, correspondence, and related records.	Global Sourcing	Until sold and tax audits completed	Highly Restricted
EHS-306	Environment/Health/Safety	Environmental Permits - Exemptions	Documents reasons for claiming exemption and/or non-exemption from procuring an environmental permit. Includes correspondence, analyses, reports, calculations, and other supporting records.	Location	Permanent	Business Use
EHS-307	Environment/Health/Safety	Environmental Permits - Issued	Documents issuing of environmental permits except permits for solid waste and hazardous materials storage facilities. Includes applications, environmental statements, plans, analyses, reports, and supporting documentation. Note: For permits related to solid waste and hazardous materials storage facilities, see "Solid Waste and Hazardous Materials Storage Facilities" (EHS-324)	Location	Permanent	Business Use
EHS-308	Environment/Health/Safety	Equipment Safety Inspection and Testing	Contains records pertaining to equipment safety inspections and testing (such as those for power industrial trucks [lift trucks], fire protection equipment, cranes, zero energy state (ZES), elevators, and boilers. Includes inspections, test results, remedial actions, and related records.	Location	Annual: 3 years; Quarterly: 2 years; Monthly: 1 year; Weekly and daily: 90 days; Boilers and elevators: Life of equipment + 5 years; All other: Current until superseded + 5 years	Business Use
EHS-309	Environment/Health/Safety	Hazardous Materials Removal Project Management	Documents hazardous materials abatement projects. Includes project plans, drawings, training, licenses and registrations, description of operations and procedures followed, disposal site information, environmental testing, and related records.	Location	After project completed + 30 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
EHS-310	Environment/Health/Safety	Industrial Hygiene	Documents measures taken to monitor the workplace environment for hazardous substances or conditions, except for radiation exposure. Contains measures taken to conduct employee workplace contact tracing between colleagues. Contact tracing documents are considered exposure records when they indicate close contact with another individual who has tested positive for COVID-19. Includes methodologies used, sampling plans, summary of background data relevant to interpreting results obtained, laboratory reports and worksheets, and related records. Note: For records related to radiation exposure, see "Industrial Hygiene - Radiation Protection" (EHS-315).	Location	40 years; Employee contact tracing forms: 90 days; Employee contact tracing documents that indicate a close contact with a colleague who tested positive within the initial 90-day retention period: 40 years	Business Use
EHS-311	Environment/Health/Safety	Hazardous Materials (HAZMAT) Site Security Plans	Contains required hazardous materials plans at sites. Includes plans, risk assessments, worst case scenarios, and other records supporting implementation.	Location	Until superseded + 5 years	Business Use
EHS-312	Environment/Health/Safety	Incident Tracking - EHS Event Reporting	Documents information related to Environmental, Health and Safety events. Includes EHS events, complaints, and regulatory (agency) inspections. Note: For records related to the identification and resolution of spills and releases see "Spills and Releases" (EHS-313) and "Injury and Illness Reporting" (EHS-317) for the reporting of employee-related injuries or illnesses.	Environment, Health & Safety	Until superseded or as specified by permit, license, law, or regulations. After 5 years, descriptive fields that link an event to a specific person or other identifying information may be removed from all events except LIFE events.	Business Use
EHS-313	Environment/Health/Safety	Spills and Releases	Documents reporting and remediation activities for environmental spills and releases, other than those involving Superfund sites and storage tanks. Includes reports, analyses, studies, remediation plans, supporting documentation, and related records. Note: For records related to Superfund sites and storage tanks, see "Spills and Releases - Superfund Sites (Including State Equivalent)" (EHS-314) and "Storage Tanks" (EHS-326).	Location	After remediation completed + 5 years or as mandated by permit, agreement, order, or regulatory requirement	Business Use
EHS-314	Environment/Health/Safety	Spills and Releases - Superfund Sites (Including State Equivalent)	Documents activities at locations designated as a Superfund site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), Emergency Planning and Community Right-to-know Act (EPCRA / SARA), and other environmental regulations or a State Equivalent. Includes environmental assessments, notification of hazardous waste site, record of decision, studies, analyses, reports, correspondence, expenses, CERCLA claims, closure documentation, and related records. Note: For tank-related leaks see "Storage Tanks" (EHS-326).	Location	Permanent	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
EHS-315	Environment/Health/Safety	Industrial Hygiene - Radiation Protection	Documents measures taken to protect employees and contractors against radiation exposure. Includes protection program provisions, Nuclear Regulatory Commission (NRC) Forms 4 and 5, audits and reviews, surveys, samplings, calibrations, individual dose limits, and related records.	Location	Protection audits, reviews, surveys, samplings, calibrations, Forms 4 & 5, and supporting records: 3 years; Other records: After license terminated + 3 years	Business Use
EHS-316	Environment/Health/Safety	Medical Records	Documents medical treatment and assessment of employees and contractors. Includes complaints, injuries and illnesses, examinations, audiometric testing, hazardous substance exposure surveillance monitoring, diagnoses, test results, treatment, and related records.	On-Site Registered Nurse (RN) or Designee	Employee or Contractor termination + 40 years	Highly Restricted
EHS-317	Environment/Health/Safety	Injury and Illness Reporting	Contains required federal, state, and local government reporting of on-the-job injuries and illnesses (such as those for the Occupational Safety & Health Administration (OSHA)). Includes reports, logs, privacy case lists, surveys, and annual summary forms. Note: Excludes drug testing, worker's compensation, and health and disability documentation.	Location	6 years	Business Use
EHS-318	Environment/Health/Safety	Licenses, Registrations, Accreditations and Certifications - Environment, Health & Safety	Contains required licenses and accreditations for operations. Includes applications, licenses, certifications, and related records.	Location	Until expired + 3 years	Business Use
EHS-319	Environment/Health/Safety	Safety Data Sheets (SDS)	Documents a substance's physical and chemical properties, potential hazards when using, precautions to take, proper storage, clean up procedures, and other information. Includes chemical identity, ingredients, characteristics, hazardous properties, safe handling, and other information.	Location using hazardous materials	Until superseded + 30 years	Business Use
EHS-320	Environment/Health/Safety	Pesticide Applications	Documents use of pesticides on company property. Includes applications, inspections, sampling notifications, and related records.	Location	3 years	Business Use
EHS-321	Environment/Health/Safety	Safety and Health Program Management	Documents the management and administrative oversight of the company's employee safety and health programs, including bloodborne pathogens. Includes program development records, regulatory compliance requirements, action plans, project oversight documentation, employee communications, and other related documentation.	Corporate Health & Safety; Location	Until superseded + 3 years	Business Use
EHS-322	Environment/Health/Safety	Safety Committee Meetings	Documents issues taken up by local safety committees. Includes member rosters, agendas, meeting minutes, exhibits, and related records.	Location	3 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
EHS-323	Environment/Health/Safety	Safety Permits and Procedures	Contains safety permits, line breaking permits, bulk chemical unloading permits, fit tests, and procedures to protect employees and contractors and to meet regulatory requirements for certain operations. Includes hot work and confined space entry permits, respiratory fit tests, and internal procedures such as line breaking, power line, man basket, jack hammer, trenching, and groundbreaking.	Location	Permits: Until expired + 1 year; Fit Tests: Until next testing; Hot Work permit: 1 year; Other records: Until superseded	Business Use
EHS-324	Environment/Health/Safety	Solid Waste and Hazardous Materials Storage Facilities	Documents processing, treatment, storage, and closure and post closure plans and cost estimates at solid waste treatment, landfill, and hazardous waste facilities. Includes applications, environmental statements, permits, reports, studies, site plans, groundwater monitoring, air emissions testing, inspections, certifications, closure plans, post-closure cost estimates, and related records.	Corporate Environment, Health & Safety; Location	Permits, final application, testing, and final closure records: Permanent; Inspections: 5 years; Other records: After site closed + 3 years	Business Use
EHS-325	Environment/Health/Safety	Beneficial Use of Residual Waste Materials	Documents the tests of non-hazardous waste materials to characterize the material for beneficial use. Includes applications, inspections, test results, utilization plans, permits, correspondence, list of exempt material, contracts and agreements, approvals, and related records.	Location	Permanent	Business Use
EHS-326	Environment/Health/Safety	Storage Tanks	Documents operations and maintenance of above and below ground storage tanks. Includes installation, calibration, piping protection, system inspections, tests, release detection, leak cleanup, maintenance, repairs, closure, fired and unfired pressure vessels and related records.	Location	Life of tank + 10 years or as specified by permit, license, law, or regulation; Leak clean-up and closure: Permanent	Business Use
EHS-327	Environment/Health/Safety	Toxic Substances Chemical Data Reporting	Documents production, use, and distribution of chemicals or mixture of chemicals as regulated by the Toxic Substance Control Act (TSCA). Includes chemical inventories, corrective actions, and related records.	Location	5 years	Business Use
EHS-328	Environment/Health/Safety	Waste Shipments	Documents receipt, shipment, or transfer of hazardous and non-hazardous waste. Includes shipping manifests, tickets, papers, and related records.	Location	Hazardous waste: 3 years; Other shipments: 2 years	Business Use
EHS-329	Environment/Health/Safety	Workers Compensation Claims Management	Documents workers compensation claims filed against the company. Includes injury reports, investigations, board hearings, treatment, billing, denials, appeals, judgments, releases, and related settlement records. Note: For denied workers compensation claims see "Disability and Medical Leaves" (HUM-507).	Claims Administrator	Releases / Settlement papers: 75 years; Denied claims: After decision made + 10 years; NY: 18 years; Other records: Until settled and last payment issued + 10 years	Highly Restricted

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
EHS-330	Environment/Health/Safety	Environmental - Production and Emissions Tracking	Documents production data, emissions data, and other information used to calculate baseline actual emissions to future actual emissions for permitting projects. Includes post project emissions tracking for projects that do not trigger new source review but meet a regulatory threshold for recordkeeping.	Location	Data used to calculate baseline actual emissions: 10 years; Post project emissions tracking if design capacity or potential to emit is increased: 10 years unless state rules mandate a longer time period; Post project emissions tracking if design capacity or potential to emit is NOT increased: 5 years unless state rules mandate a longer time period.	Business Use
EHS-331	Environment/Health/Safety	Toxic Substances Significant Adverse Reactions	Records of significant adverse reactions alleged to have been caused by chemical substances or mixtures manufactured or processed	Location	Employees: 30 years; Non-Employees: 5 years	Business Use
FIN-400	Finance	Accounting Policies & Interpretations	Documents accounting practices and principles used to determine appropriate treatment of company transactions. Includes notices, action plans, policy statements, and related records.	Corporate Accounting & Financial Reporting	All tax audits completed	Business Use
FIN-401	Finance	Accounts Payable	Documents company payments made for goods and services. Includes invoices, payment requests, purchase orders, payment authorizations, employee travel and expense reporting, charitable contributions, purchase card, meeting card, procurement and company credit card statements, receipts for goods, and related records supplying details to expense transactions. Note: For personal non-reimbursable expense see Travel, Entertainment and Expense Reimbursement - Policy 20115 issued by Global Financial Services – Policies & Controls.	Office responsible for processing or reconciling transactions; Accounts Payable for T&E; Card holder for Purchase Card	All tax audits completed	Highly Restricted
FIN-402	Finance	Accounts Receivable	Documents monies received for goods and services. Includes billings, receipts, journal entries, revenue statements, reconciliations, write-offs, recoveries, and related records.	Accounts Receivable; Office responsible for processing or reconciling transactions	All tax audits completed	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
FIN-403	Finance	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Financial Analysis	Documents financial implications of a proposed company acquisition, merger, joint venture, or divestiture. Includes reports, analyses, supporting documentation, and related records.	Corporate Accounting & Financial Reporting; Planning & Analysis; Business Finance Leads	All tax audits completed and ownership / participation terminated	Business Use
FIN-404	Finance	Bank Account Administration	Documents administration of bank accounts. Includes agreements, correspondence, signature authorizations, and related relationship records.	Treasury	Until account closed + 6 years	Highly Restricted
FIN-405	Finance	Financial Guarantees	Contains financial guarantees provided by the company. Includes letters of credit, "comfort letters", and related records.	Treasury	All tax audits completed and guarantee expired	Business Use
FIN-406	Finance	Financial Planning and Forecasting	Documents development and monitoring of annual company financial plan. Includes revenue and expenditure forecasts, variances, budget plans, workpapers, monitoring reports, allocations, and related records.	Controlling Office	5 years	Business Use
FIN-407	Finance	Insurance Coverage	Documents company insurance coverage for general liability, casualty, worker compensation, fire, vehicle, flood, travel, environmental, and other areas. Includes policies, bonds, certificates, riders, premiums paid, loss summaries, correspondence, and related records.	Global Risk Management; Office securing policy	Casualty and Liability Policies, Bonds, and Certificates (Including Environmental and Hazardous Materials Coverage): Permanent; Other policies, bonds, and certificates: Until expired + 10 years; Other records: All tax audits completed	Restricted
FIN-408	Finance	Banking and Cash Management	Documents banking and cash management transactions. Includes statements, drafts, deposits, wire and other transfers, confirmations, credits, reconciliations, reports, and related records.	Treasury; Wire Transfer: AP; Office responsible for processing or reconciling transactions	All tax audits completed	Highly Restricted
FIN-409	Finance	Corporate Consolidated Financials	Documents the consolidated financials to support the company's final Financial Statements. Includes individual financial statements by reporting locations, consolidation and performance reporting adjustments, and related records. Individual subsidiary financial statements and statutory audit reports, where performed.	Corporate Accounting & Financial Reporting	All tax audits completed	Highly Restricted

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
FIN-410	Finance	Corporate Credit Cards	Documents issuance of procurement and travel and expense credit cards to employees. Includes applications, authorizations, and related records.	Accounts Payable	Until account closed + 6 years	Highly Restricted
FIN-411	Finance	Customer Credit Accounts	Documents issuance of credit to customers. Includes account applications, references, credit reports, copies of guarantees and promissory notes, correspondence, collections, payment plans, write-offs, and related records.	Credit; Controlling Office	All tax audits completed	Highly Restricted
FIN-412	Finance	Debt Management	Documents the borrowing, lending and management of loans, bonds, and other debt instruments internally and externally. Includes agreements, amendments, bonds, mortgages, promissory notes, stock certificates, schedules, reports to lenders, payments, loan financing documents, credit worthiness analyses, and related records.	Treasury; Controlling Office; Corporate Accounting	All tax audits completed and debt repaid	Restricted
FIN-413	Finance	Derivatives and Other Treasury Transactions	Documents derivative and other treasury transactions entered into by the company such as currency swaps, stock repurchases, timber monetization, and bond buybacks. Includes foreign currency transaction details, hedge accounting documentation, valuation schedules, confirmations, correspondence, workpapers, and related records.	Corporate Accounting & Financial Reporting	All tax audits completed	Business Use
FIN-414	Finance	Financial Analyses and Reporting	Documents sales, costs, and other financial conditions affecting the company used to support management decision-making. Includes reports, studies, forecasts, trends, plans, rating agency reviews, goodwill impairment valuations, and related records. See also "Acquisitions, Mergers, Joint Ventures, recapitalization and Divestitures - Financial Analysis" (FIN-403) for records subject to a transaction.	Corporate Accounting & Financial Reporting; Planning & Analysis; Local Accounting Office	Goodwill impairment evaluations: All tax audits completed; Other records: 6 years	Business Use
FIN-415	Finance	Financial Audits - External	Contains financial audits performed by service providers. Includes audit reports, correspondence, consolidated and separate subsidiaries, and related records.	Corporate Accounting & Financial Reporting; Office audited	7 years	Highly Restricted
FIN-416	Finance	Financial Internal Standard Control Reporting	Contains key financial reports that are used to support audit verifications. Includes SOX reporting, internal standard controls, review and approval, and other supporting documentation.	Location; Department	Annual & quarterly reports: 1 year; Semi-annual reports: Two most recent reports; Monthly reports: 6 months; Daily & weekly reports: 3 months	Highly Restricted

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
FIN-417	Finance	Internal Control Documentation	Documents review of company financial statements and mechanisms used to prevent and detect fraud. Includes SOX Quarterly & Annual reporting, QR 16 representation letters, SOC1/SSAE18 reporting, testing results, internal control tracking, correspondence, control assessment documentation, segregation of duties and sensitive access reviews and related records.	Department	7 years; Control assessment documentation: 3 years; Monthly & yearly access reviews: 1 year	Restricted
FIN-418	Finance	Financial Statements	Contains official annual and quarterly reports documenting the general financial condition and operation of the company. Includes valuations, costs, expenses, explanatory statements, and related information. See also "Regulatory Reporting - Securities & Exchange Commission (SEC) Filings" (FIN-435) for the quarterly and annual reports filed with the Securities and Exchange Commission (SEC). Note: Quarterly statements are summarized in the annual statement which is prepared and signed by the company's outside auditor.	Corporate Accounting & Financial Reporting; Tax; Office preparing statement	Annual statement: Permanent; Other records: 10 years	Business Use
FIN-419	Finance	Fixed Assets	Contains records used to track company fixed assets, including real estate, buildings, equipment, vehicles, and other similar fixed assets. Includes asset registers, depreciation schedules, amortization, valuations, appraisals, property acquisition and disposal, transfers, and related records.	Global Financial Services; Office Responsible for Asset Accounting	All tax audits completed and Life of asset + 10 years	Business Use
FIN-420	Finance	General Ledger	Documents general ledger transactions. Includes account reconciliation, balance sheet reporting, chart of accounts, journal entries, validations, inventory calculations, and related records used for final accounting of annual business activities.	Office responsible for processing or reconciling transactions	Final General Ledger for year: Permanent; Other records: All tax audits completed	Business Use
FIN-421	Finance	Imputed Income	Documents tax liability associated with services of a personal nature provided to the employee and paid by the company, such as personal travel, employee's commute, personal aircraft usage, or other personal use of company assets. Includes reports documentation, calculations, determination, and related records.	Human Resources Service Center; Office responsible for calculation	All tax audits completed + 15 years	Business Use
FIN-422	Finance	Intellectual Property - Royalties	Documents the receipt of royalties from license agreements. Includes agreements, payments, correspondence, and related records.	Legal	All tax audits completed and agreement expired	Business Use
FIN-423	Finance	Intercompany Accounting	Documents intercompany transactions. Includes account transfers, reconciliations, invoices, transmittals, journal vouchers, journal entries, and related records.	Office responsible for processing or reconciling transactions	All tax audits completed	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
FIN-424	Finance	Investment Performance - Money Market Management	Documents the management of company-owned, short-term money market investment funds. Includes statements, confirmations, correspondence, and related records.	Treasury	All tax audits completed	Highly Restricted
FIN-425	Finance	Investment Performance - Retirement Fund Reporting	Documents the performance of investments used to fund the company's retirement programs. Includes reports created by service providers, fund names, gains and losses, and related information.	Trust Investments	10 years	Highly Restricted
FIN-426	Finance	Cost and Profitability	Documents costs of manufacturing products. Includes standard costs and variances, reports, studies, workpapers, calculations, cost determinations, raw materials, finished goods, and related records.	Office responsible for cost determination	All tax audits completed	Business Use
FIN-427	Finance	Payroll	Documents amount received and deductions taken from employee's pay. Includes vouchers, reconciliations, and related records.	Office responsible for processing or reconciling transactions	All tax audits completed	Highly Restricted
FIN-428	Finance	State Sales Tax Exemption Certificates	Documents exemption to a buyer or a seller from paying state sales tax on the specified item.	Location	All tax audits completed and certificate expired	Business Use
FIN-429	Finance	Tax Basis Files, Earnings, and Profits Files	Documents company's tax basis in subsidiaries, partnerships, joint ventures, and other investments. Includes workpapers and supporting documentation and earnings & profits files.	Tax	Permanent	Highly Restricted
FIN-430	Finance	Tax Filings - Returns and Workpapers	Documents preparation and submission of company tax returns, including income, sales and use taxes, excise, property, franchise, payroll, and others with federal, state, and local taxing authorities. Includes submitted returns, workpapers, adjustments, credits, disclosures, exemptions, and supporting records.	Office submitting filing	Income Tax Returns: 75 years; Workpapers and other records: All tax audits completed + 10 years	Highly Restricted
FIN-431	Finance	Tax Identification Certification - W-9s	Documents tax-related information received from service providers in order to prepare required 1099 forms.	Global Sourcing; Finance; Location	All tax audits completed	Business Use
FIN-432	Finance	Tax Withholding Forms	Documents wages paid and taxes withheld that were reported to taxing authorities. Includes Forms 1099, W-2, 941, and other required state and federal forms.	Finance Operations; Human Resources Service Center	All tax audits completed	Business Use
FIN-433	Finance	Regulatory Compliance - Financial Control Plans	Documents compliance with regulatory control plans, such as those for the Internal Revenue Service (IRS). Includes process designs, control matrixes, testing plans, and related records.	Finance; Information Technology	Until superseded or outdated + 10 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
FIN-434	Finance	Regulatory Reporting - Financial Certifications	Contains annual statements issued by the Chief Executive Officer (CEO) and Chief Financial Officer (CFO) certifying the company's financial statements and related disclosures. Includes sub-certifications.	Legal; Financial Policy and Control	After filed + 10 years	Business Use
FIN-435	Finance	Regulatory Reporting - Securities & Exchange Commission (SEC) Filings	Contains annual and quarterly Securities & Exchange Commission (SEC) filings such as 8-K, 10-K, 10-Q, and Form 5, eXtensible Business Reporting Language (XBRL) reporting, and other required filings. Includes filings and supporting documentation.	Corporate Secretary; Corporate Accounting & Financial Reporting	Filings: Permanent; Other records: After filed + 10 years	Highly Restricted
FIN-436	Finance	Risk Management - Locations	Documents measures taken at locations to mitigate insurance risks. Includes copies of engineering drawings, site inspections, reports, and related records.	Global Risk Management	Until superseded or outdated	Business Use
FIN-437	Finance	Surety Bonds	Contains contract and commercial surety bonds for products and services. Includes performance, court, license and permit, and miscellaneous bonds, correspondence, and related records.	Global Risk Management	Contract obligations cease + 6 years	Business Use
FIN-438	Finance	Tax Audit Files	Documents audits done on federal, state, and local tax returns. Includes copy of return and workpapers, documentation requests, responses, copies of records submitted, correspondence, settlement, legal advice and counsel, subpoenas, information requests, and related records.	Tax	All tax audits completed + 20 years	Highly Restricted
FIN-439	Finance	Tax History Files	Documents positions taken on tax filings. Includes determination letters, Internal Revenue Service (IRS) agent reports, copy of closing agreements, rulings, legal opinions, court orders, and related records.	Tax	Permanent	Highly Restricted
FIN-440	Finance	Unclaimed Property Reporting	Documents unclaimed and escheated property reported to states. Includes reports and supporting documentation.	Corporate Accounting & Financial Reporting	25 years	Business Use
HUM-500	Human Resources	Affirmative Action	Contains Corporate headquarters and location affirmative action plans documenting compliance with the requirements of the Office of Federal Contract Compliance Program (OFCCP). Includes plans, reports, analyses, audits, and supporting records.	Contract Compliance Department; Location	After plan issued + 3 years; New York: After plan issued + 5 years	Highly Restricted
HUM-501	Human Resources	Benefit Claims	Documents claims submitted for medical, retirement, and other company benefits. Includes eligibility, pension calculations, determination, escalations, decisions, appeals, payments, and related records.	Global Compensation & Benefits	After claim resolved + 7 years and all plan payouts completed	Highly Restricted

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
HUM-502	Human Resources	Benefit Claims Reporting	Documents claims paid under company benefit plans. Includes reports from claims administrators and claims data used for historical trending. See also "Workers Compensation Claims Management" (EHS-329) for the individual claims records.	Global Compensation & Benefits	100 years	Highly Restricted
HUM-503	Human Resources	Benefit Plans - Administration	Contains records documenting the administration of the company's benefit plans. Includes claims administrator agreements and amendments, rate structure determinations, actuarial valuations, calculations, funding support, and related records.	Global Compensation & Benefits	Agreements and amendments: Obligations cease + 6 years; Other records:10 years	Restricted
HUM-504	Human Resources	Benefit Plans - Plan Development, Governance and Reporting	Contains finalized benefit plans and records documenting governance for medical, pension, insurance, savings, and other company benefits, including those of legacy plans and programs obtained through acquisitions and mergers. Includes plans, amendments and revisions, summary plan descriptions, non-discrimination testing, Form 5500 and other Employee Retirement Income Security Account (ERISA) filings, Summary Annual Report (SAR) to participants, Internal Revenue Service (IRS) fringe benefit filings, correspondence, communications, presentations, training materials and working papers.	Global Compensation & Benefits; Benefits Accounting; Legal	Workpapers: After plan finalized + 6 years; Other records: Permanent	Restricted
HUM-505	Human Resources	Compensation Plans - Awards	Contains records used to formulate specific payouts to employees and retired executives under the Performance Share Plan (PSP), Management Incentive Plan (MIP), Supplemental Executive Retirement Plan (SERP), and the Merit Award Plan (MRP), gainsharing, bonus, stock option, and commission programs. Includes awards, payouts, stock option grants, calculations and other workpapers, correspondence, and records of legacy plans and programs obtained through acquisitions and mergers.	Global Compensation & Benefits; Human Resources	All tax audits completed and final payout + 10 years	Highly Restricted
HUM-506	Human Resources	Compensation Plans - Development	Documents development of annual compensation plans and programs for hourly, salaried, commission, and executive employees. Includes policies, guidelines, salary structure data, and related records.	Global Compensation & Benefits	10 years	Business Use
HUM-507	Human Resources	Disability and Medical Leaves	Documents application for and decision made to grant an employee leave, including short term (STD) and long term disability (LTD), sickness and accident (S&A), and leaves under the Family Medical and Leave Act (FMLA). Includes forms, correspondence, determination, and related records.	Human Resources Service Center	After decision made or leave completed, whichever is longer + 3 years	Highly Restricted
HUM-508	Human Resources	Drug Testing	Documents drug testing for job applicants and company employees. Includes applicant and employee consent forms, chain of custody forms, test results, refusals, calibrations, correspondences to applicant and employees related to test results and related records.	Human Resources	Positive employee results: 10 years; Positive applicant results, refusals, and calibration: 5 years; Negative results: 3 year	Highly Restricted

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Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
HUM-509	Human Resources	Employee Issues and Investigations	Documents non-legal issues brought by or concerning company employees, such as complaints or internal disciplinary matters. Includes correspondence, investigation notes, reports, findings, and determinations.	Human Resources; Supervisor; Ethics & Compliance	Employee termination + 3 years	Business Use
HUM-510	Human Resources	Grievances and Arbitration	Documents formal complaint and proceedings brought by an employee concerning alleged violation of collective bargaining or legal employment rights. Includes complaint, investigation, mediation, arbitration, determination, appeal, and related records.	Location	After settled + 10 years; Collective Bargaining Arbitration Award: Permanent	Business Use
HUM-511	Human Resources	Labor Relations - Collective Bargaining Negotiations	Documents negotiations over collective bargaining agreements. Includes correspondence, meeting minutes, analyses of issues, position statements, benefit cost information, draft agreement language, and related records. Note: For official union agreements, see "Contracts and Agreements - Collective Bargaining" (LGL-706).	Employee Relations; Location	Bargaining obligations cease + 5 years	Restricted
HUM-512	Human Resources	Job Catalog	Documents approved positions within the company. Includes position number, name, and description.	Global Compensation & Benefits	Permanent	Business Use
HUM-513	Human Resources	Labor Relations - Union Employee Notices	Documents mandatory work-related notices given to union employees per their union agreement. Includes facility shutdowns and other events affecting their work environment.	Location	Until contract obligations cease	Business Use
HUM-514	Human Resources	Manager's Employee Desk File	Documents manager's discussions with employees during one on ones, career development, issues brought up by an employee, disciplinary matters and actions. Includes notes and other related records to assist manager in performance reviews and career discussions, correspondence, investigation notes, reports, findings, and determinations. Note: Any employee records that are deemed to be part of the "Official Employee File" should be sent to the Human Resources Manager for inclusion in the employee's "Official Employee File".	Department	No longer than termination or transfer + 1 year	Highly Restricted
HUM-515	Human Resources	Official Employee File	Documents employee history with the company. Includes application, offer letter and hiring documents, employment contracts and agreements, personnel change notices, compensation determination method, hourly wage rate sheets, compensation history, certifications, awards, letters of commendation, skills testing results, performance evaluations, termination checklists and releases, training records, non-compete, conflict of interest, change of controls, equity award agreements letter of understanding-expats and related records.	Human Resources; Global Compensation & Benefits	Employee termination + 50 years	Highly Restricted

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
HUM-516	Human Resources	Payroll Deductions	Documents authorizations and court ordered withholdings for payroll deductions. Includes direct deposit, tax withholdings, loans, promissory notes, child support levies, garnishments and liens, authorization forms, status changes, W-4s, and related records.	Human Resources Service Center; Payroll; Location	Loans, Liens, and Garnishments: Final payment + 7 years; Other Records: After authorization superseded / employee termination + 4 years	Highly Restricted
HUM-517	Human Resources	Succession and Workforce Planning	Contains, personnel strategy, people reviews, succession planning, and related records.	Human Resources; Department	10 years	Highly Restricted
HUM-518	Human Resources	Position Descriptions	Contains description of positions. Includes requirements, responsibilities, duties, and other details on positions.	Human Resources; Department issuing job description	Until superseded / position abolished + 4 years	Business Use
HUM-519	Human Resources	Recruitment Program	Documents efforts made to advertise and recruit for open positions. Includes job postings, advertisements, diversity outreach letters, college recruiting blitzes, correspondence, and related records.	Human Resources	6 years	Highly Restricted
HUM-520	Human Resources	Hiring Process - Applicant, Selection, and Hiring	Documents employee selection and hiring process for open positions. Includes requisitions and job posted, applications, resumes, testing materials, HR and manager interview logs, and reference checks, voluntary self identification forms, hire letter / denial letters, hire checklists, and related records.	Human Resources	Records for successful candidates: Move to " Official Employee Files"; Records for other applicants: After decision made + 3 years	Business Use
HUM-521	Human Resources	Recruitment - Background Checks	Contains reference, credit, vendor background check request forms, vendor background check results and reports, Fair Credit Reporting Act (FCRA) letters, and other background checks. Includes reports, notes, correspondence, and related records.	Human Resources	5 years	Highly Restricted
HUM-522	Human Resources	Regulatory Reporting - Office of Federal Contract Compliance Program (OFCCP)	Documents required reporting to the Equal Employment Opportunity Commission (EEOC). Includes EEO-1 and VETS-100 reports.	Contract Compliance Department; Location; Legal	After report issued + 3 years; New York: After report issued + 5 years	Business Use
HUM-523	Human Resources	Training - Non-Regulated	Documents company training not mandated by law or regulation. Includes training schedules, attendance sheets, course materials, and related records. See also "Training - Regulated" (HUM-524) for documentation related to regulated trainings.	Office(s) responsible for development / delivery and / or attendance tracking	Course materials: Until superseded or outdated + 3 years; Other records: 2 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
HUM-524	Human Resources	Training - Regulated	Documents company training mandated by law or regulation, such as antitrust, safety, CPR & First Aid, equipment operation, hazardous materials handling, and others. Includes training schedules, attendance sheets, course materials, certificates of completion, and related records. See also "Training - Non-Regulated" (HUM-523) for documentations related to non-regulated trainings.	Office(s) responsible for development / delivery and / or attendance tracking	Certificates Of Completion: Employee termination + 6 years; Course materials: Until superseded or outdated + 6 years; Radiation safety training: 10 years; Other records: 6 years	Business Use
HUM-525	Human Resources	Benefit Plans - Enrollments and Elections	Documents annual participation in company benefit plans. Includes enrollments, elections, beneficiary and change forms, and related data.	Human Resources Service Centers; Location	Until superseded + 6 years or plan obligations cease	Highly Restricted
HUM-526	Human Resources	Employee Relocation	Documents process for relocating employees. Includes approval forms, invoices and other expense documentation, agreements, correspondence, tax equalization information, policy exceptions, and related records.	Human Resources Operations	All tax audits completed + 7 years	Highly Restricted
HUM-527	Human Resources	Employment Eligibility Verifications	Documents employee eligibility to work within the United States. Includes Form I-9, H-IB visa documentation, green card labor applications and notifications, TN and L-1A visa immigration and naturalization forms, correspondence, and related records.	Human Resources; Location	Employee termination + 3 years	Highly Restricted
HUM-528	Human Resources	Labor Relations - Bids and Awards	Documents union bid and award process for covered positions. Includes seniority rosters, bids, awards, and related records.	Human Resource; Location	Seniority rosters: Until superseded + 2 years; Other records: After position awarded + 2 years	Business Use
HUM-529	Human Resources	Labor Relations - Union Representation Campaigns	Documents strategy adopted during collective bargaining agreement campaigns. Includes worksheets, cost analyses, campaign materials, presentations, correspondence, benefits offerings such as health & welfare, and related records.	Employee Relations	5 years	Business Use
HUM-530	Human Resources	Time Reporting	Documents employee time reporting. Includes time sheets, time tickets, and other records detailing hours worked. Note: For time sheets and related records for temporary employees, contractors, consultants, and other service providers, see "Accounts Payable" (FIN-401).	Human Resources Service Center; Entry location	6 years	Highly Restricted
HUM-531	Human Resources	Training - Management Development Program	Documents development of courses used to train employees on management and leadership skills. Includes manuals, guides, employee interviews, instructional content, and related records.	Staffing & Development	Until superseded / no longer used + 3 years	Business Use
ITL-600	Information Technology	Asset Management - Information Technology Equipment	Documents life cycle of computer and other information technology equipment. Includes make, model, serial number, location, and other information.	Information Technology	After equipment disposed of + 3 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
ITL-601	Information Technology	Computer System Application Documentation	Documents purchase or in-house creation of applications, including implementation and removal / disposal of computer software from company systems. Includes purchasing, installation, software keys, source code / program listing, application design documentation, job control language, upgrades, modifications, removals / disposition, and related records.	Information Technology	Financial applications supporting tax audits: All tax audits completed; Other records: Until data is migrated or purged and documentation is no longer relevant to existing data, or the application is permanently retired	Restricted
ITL-602	Information Technology	Hardware Documentation	Documents purchase, implementation, and disposal of computer hardware used in company systems. Includes warranties, operating manuals and documentation, installation configurations into system architecture, inspection, maintenance, repair, disposition, and related records.	Information Technology	Architecture, configurations, and documentation for systems supporting tax audits: All tax audits completed; Other records: after hardware disposed of + 6 years	Business Use
ITL-603	Information Technology	Information Technology Standards and Processes	Documents hardware and software standards and related processes used by the company. Includes quality assurance, design, review, support, process flow diagrams, and related records.	Information Technology	Until superseded or outdated	Business Use
ITL-604	Information Technology	Internet Domain Names and Addresses	Documents the management of the company's domain names and addresses. Includes names, addresses, host servers, registrations, renewals, and other related records.	Information Technology	Until registration expired + 6 years	Restricted
ITL-605	Information Technology	Project Management - Information Systems	Contains all project management documentation supporting a new application or enhancements to an existing application. Includes project delivery process (PDP) documentation, business requirements and analysis, project plans, work plans, change requests, and related records. See also "Computer System Application Documentation" (ITL-601) for the official system design and documentation records maintained by Information Technology.	Project Manager	Financial programs supporting tax audits: All tax audits completed; Other records: Until data is migrated or purged and documentation is no longer relevant to existing data, or the application is permanently retired.	Business Use
ITL-606	Information Technology	Software Management and Licensing	Documents the use of software in the company (such as those on the desktop, enterprise, server, third party tools, and mobile applications) to ensure system compatibility and compliance with license and copyright provisions. Includes software evaluations, compatibility testing, software licenses, site licenses, and related records.	Information Technology; Location	Financial programs holding information needed for open tax audits: All tax audits completed and license expired + 6 years / application no longer used; Other records: License expired + 6 years / application no longer used	Business Use
ITL-607	Information Technology	System Monitoring Activities	Documents electronic files or automated logs created to monitor computer system activities. Includes operations, applications and database logs (such as internet usage or error logs), and related records.	Information Technology; Office monitoring access	Until superseded or outdated	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
ITL-608	Information Technology	System Table Maintenance	Documents the additions, deletions and changes of items in system tables.	Office responsible for table maintenance	Master data supporting tax audits: All tax audits completed; Other records: Until superseded or outdated	Business Use
ITL-609	Information Technology	System User Access	Documents access provided to users. Includes security login information, name, user ID, date, system, and related information.	Information Technology; Office controlling access	Network User Id: 99 years; Other records: Until deleted or outdated	Highly Restricted
LGL-700	Legal	Purchase, Sales, Leases, Sublease, Demolitions, Improvements, and other Real Estate Transactions – Real Property	Documents real estate transactions. Includes abstracts, contracts, agreements, closing statements, deeds, easements, liens, amendments, addendums, notices of commencement, partitions, surveys, title insurance, transfers, sales, contracts and agreements for design, construction, renovation, improvements to company buildings and real estate, renewals, correspondence, other records documenting ownership or use, and supporting records.	Local Office; IP Global Real Estate	Permanent	Business Use
LGL-701	Legal	Advice and Counsel	Documents advice and counsel given by company lawyers and external legal counsel on matters affecting the company. Includes correspondence and supporting records.	Legal; Tax	No longer than 5 years; Tax legal advice: All tax audit completed + 20 years	Highly Restricted
LGL-702	Legal	Business and Product Development Legal Oversight	Documents oversight of business and product development activities. Includes copies of sales and marketing analyses, market research, industry information, development information, marketing collateral, sales materials, and related records.	Legal	No longer than 5 years	Business Use
LGL-703	Legal	Compliance Program Development and Maintenance	Documents compliance program activities. Includes program goals and objectives, responsibility statements, certifications, training, communication, and related records.	Office responsible for design, implementation and / or enforcement	Until superseded or outdated	Business Use
LGL-704	Legal	Conflict of Interest Waivers	Documents waivers granted by the company to outside counsel. Includes waivers, correspondence, and related records.	Legal	After termination of specific representation + 6 years	Business Use
LGL-705	Legal	Contracts and Agreements	Contains agreements and contracts other than those specified in other areas of the Master Records Retention Schedule such as customer and vendor contracts. Includes leases, renewals, amendments, non-disclosure, confidentiality, EHS contractor packet, change orders, correspondence, statements of work, and other supporting records. Note: For employee related contracts and agreements, see Official Employee Files (HUM-515)	Office controlling contractual relationship	Contract expiration + 6 years	Highly Restricted

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
LGL-706	Legal	Contracts and Agreements - Collective Bargaining	Documents agreements with labor unions as part of the collective bargaining process. See also "Labor Relations - Collective Bargaining Negotiations" (HUM-511) for records documenting the contract negotiation process.	Human Resources	Permanent	Business Use
LGL-707	Legal	Intellectual Property - Abandoned Trademark Applications	Documents abandoned registration of trademarks. Includes correspondence, opinions, applications, searches, and related records.	Legal	Application abandoned + 6 years	Highly Restricted
LGL-708	Legal	Intellectual Property - Common Law Trademarks	Documents company's use of its common law trademarks. Includes searches and other related records.	Legal	Date Trademark use discontinued + 6 years	Business Use
LGL-709	Legal	Intellectual Property - Copyrights	Contains copyright applications and registrations. Includes correspondence, searches, and related records.	Legal	Until copyright expired + 6 years	Highly Restricted
LGL-710	Legal	Intellectual Property - Patents	Documents patent filings and related administrative proceedings such as oppositions, re-examinations or interferences. Includes applications, fee transmittals, specifications, correspondence, opinions, oaths, declarations, and related records.	Legal	After patent application abandoned, or last Foreign or U.S. counterpart lapsed or expired + 6 years	Highly Restricted
LGL-711	Legal	Intellectual Property - Registered Trademarks	Documents registering of company trademarks. Includes registrations, filings, certifications, specimens, renewals, and supporting records.	Legal	Life of registration and / or registration cancelled + 6 years	Highly Restricted
LGL-712	Legal	Intellectual Property - Trademark Searches	Documents trademark searches conducted. Includes search records, specimens, and right-to-use opinions.	Legal	After search completed + 6 years	Business Use
LGL-713	Legal	Legal Proceedings - Asbestos	Contains records related to asbestos litigation and claims cases. See also "Workers Compensation Claims Management" (EHS-329) for worker's compensation related claims.	Legal (Managing Attorney)	Permanent	Highly Restricted
LGL-714	Legal	Legal Proceedings - Third Party Subpoenas & Other Information Requests	Documents orders, subpoenas, and other requests received from third parties. Includes order, subpoena, response, correspondence, and related records. See also "Public Information Requests" (COR-215) for records documenting the responses to inquiries and requests for publicly-available company information.	Legal	No longer than 3 years	Highly Restricted
LGL-715	Legal	Licenses, Registrations and Certifications – Federal Communications Commission (FCC)	Contains license applications, registrations and certifications approved by the Federal Communications Commission (FCC).	Office managing the license	Duration of license	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
LGL-716	Legal	Product Liability Warranty Claims	Documents warranty claims received on the company's products. Includes claim, investigation, and related records. Note: For the release and / or settlement agreement, see "Releases and Settlements" (LGL-717).	Legal	Masonite claims: Warranty period or no longer than after settled + 18 years; Other claims: After settled or released + 15 years	Business Use
LGL-717	Legal	Releases and Settlements	Contains releases and settlements, other than those specified in other areas of the Master Records Retention Schedule, that document the release of the company from future obligations and / or terms to settle a legal matter. Includes releases, settlements, and annuities.	Legal	75 years	Restricted
LGL-718	Legal	Right of Ways and Easements	Documents the legal rights enabling the company or another entity to transport goods over a particular land or property. Includes easements, agreements, right-of-ways, correspondence, and related records.	Global Supply Chain	Until revoked or expired + 10 years	Business Use
LGL-719	Legal	Transportation Claims - Loss / Damage	Documents transportation and loss damage claims. Includes findings, damaged load information, correspondence, credits, adjustments, write-offs, and related records.	Global Supply Chain; Location	All tax audits completed	Business Use
LGL-720	Legal	Vehicle Titles	Contains forms issued by the states' Department of Motor Vehicles (DMV) establishing the company as the legal owner of a vehicle. Includes related records. Note: For registration records, see "Vehicle Records" (OPS-823).	Vehicle location	Until vehicle disposed of or sold + 2 years	Business Use
LGL-721	Legal	Antitrust Oversight and Control	Documents antitrust oversight and control activities. Includes reports, studies, competitor contacts, correspondence, findings, actions taken, and related records. See also "Compliance Program Development and Maintenance" (LGL-703) for antitrust compliance program records	Legal	6 years	Highly Restricted
LGL-722	Legal	Foreign Trade Barrier Matters	Documents trade barriers and other restrictions on international sales or exports. Includes language of barrier / regulation, reports, analyses, opinions, correspondence, and related records.	Legal	After barrier / requirement removed + 5 years	Business Use
LGL-723	Legal	Helpline Cases	Documents complaints or issues received by the Helpline. Includes complainant's allegations, call notes, investigation, resolution, and related records. Note: This includes records and other data pertaining to breaches in security or allegations of fraud at company locations.	Ethics Office; Office responsible for investigation or resolution	Until resolved + 7 years	Highly Restricted
LGL-724	Legal	Insurance Claims	Documents liability and non-liability claims for reported incidents under the company's insurance policies. Includes loss reports and supporting records. See also "Workers Compensation Claims Management" (EHS-329) for job-related claim files.	Legal; Global Risk Management	Until settled + 10 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
LGL-725	Legal	Intellectual Property - Clearance Searches and Opinions	Documents searches and analysis of intellectual property rights of others in relation to company's activities, products, and processes. Includes correspondence, opinions, searches, and related records.	Legal	Life of Intellectual Property Rights + 6 years	Business Use
LGL-726	Legal	Intellectual Property - Unfiled Records of Inventions	Documents records of inventions that have not been filed. Includes correspondence, opinions, searches, and related records.	Legal	200 years	Business Use
LGL-727	Legal	Legal Proceedings	Documents litigation and claims other than those specified in other areas of the Master Records Retention Schedule. Includes notices, statements, pleadings, judgments, opinions, and related records. Note: For the release and / or settlement agreement, see "Releases and Settlements" (LGL-717).	Legal (Managing Attorney)	Until resolved or no activity + 7 years	Highly Restricted
LGL-728	Legal	Legal Proceedings - Attachments and Garnishments	Contains court orders, change orders, withholding support for employee attachments and garnishments.	Legal	5 years	Highly Restricted
LGL-729	Legal	Legal Proceedings - Remediation	Documents remediation related to Comprehensive Environmental Response Compensation and Liability Act (CERCLA / Superfund), Resource Conservation and Recovery Act (RCRA), or other remediation and state equivalent regulations. Includes settlement agreements and other related records.	Legal (Managing Attorney)	Permanent	Highly Restricted
LGL-730	Legal	Legal Proceedings - Service of Process	Contains summonses or other documents issued by a court or administrative agency served on the company or its registered agent for service of process.	Legal	5 years	Highly Restricted
LGL-731	Legal	Policies Acknowledgements	Contains forms signed by company employees documenting their acknowledgement and / or agreement to abide by various company policies or standards of behavior.	Office controlling process	Until superseded or outdated + 6 years	Business Use
LGL-732	Legal	Regulatory Audits - External	Documents external audits, examinations, and reviews from regulatory authorities such as the Securities and Exchange Commission (SEC), Department of Energy (DOE), Department of Transportation (DOT), Office of Federal Contract Compliance Programs (OFCCP), Environmental Protection Agency (EPA), Occupational Safety & Health Administration (OSHA), and other regulatory agencies. Includes questionnaires received from auditors, responses to auditors, action plans if applicable, and related records. See also "Tax Audit Files" (FIN-438) for tax-related audits.	Legal	No longer than after completed + 10 years	Business Use
LGL-733	Legal	Regulatory Communications	Documents communications with regulators on various compliance matters. Includes inquiries from regulators, the company's responses, and supporting documentation.	Office communicating with regulator	Non time limited regulatory settlements, obligations and / or undertakings: Permanent; Other records: Until superseded + 10 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
LGL-734	Legal	Regulatory Reporting	Documents regulatory reporting other than those specified in other areas of the Master Records Retention Schedule (such as Medicare Reporting). Includes workpapers, data files, and related records. See also "Regulatory Reporting - Securities & Exchange Commission (SEC) Filings" (FIN-435) for reports to the Securities and Exchange Commission and "Regulatory Reporting - Office of Federal Contract Compliance Program (OFCCP)" (HUM-522) for reports to the Equal Employment Opportunity Commission.	Office responsible for submission	10 years	Business Use
OPS-800	Operations	Bids and Proposals	Documents sourcing bids and proposals for products and services to be used by the company. Includes bids, Request for Information (RFI) / Request for Proposals (RFP), responses, evaluations, correspondence, and related records.	Global Supply Chain; Office responsible for bid process	Until superseded or outdated	Business Use
OPS-801	Operations	Shipping Documents	Documents delivery of materials and products. Includes date, transporter, contents, destination, bills of lading, tally, commercial invoices, shipping documents, container tallies, and related records and information. See also "Waste Shipments" (EHS-328) for hazardous and non-hazardous shipments . See "Import / Export Control" (OPS-811) for international destinations.	Shipping location	6 years	Business Use
OPS-802	Operations	Building and Grounds Maintenance	Documents janitorial, grounds keeping, and other facility work performed on company properties. Includes work orders, statement of repairs or work completed, and related records. See also "Pesticide Applications" (EHS-320) for records documenting the use of chemicals to control insects and other pests; "Environmental Monitoring and Testing" (EHS-304) for records documenting compliance with environmental regulations; "Railroad Records" (OPS-834) for records documenting the maintenance of rail tracks and crossings; and "Equipment Maintenance" (OPS-810) for records of maintenance and repairs to equipment located in the buildings or used in ground keeping operations.	Location	No longer than 3 years	Business Use
OPS-803	Operations	Business Planning	Contains strategic plans, operating plans, and operating strategic studies for a business. Includes strategy, working documents, sales, marketing, and staffing.	Office preparing the plan	15 years	Highly Restricted
OPS-804	Operations	Certificates of Insurance - Contractors	Contains certificates of insurance for the parties retained to provide contracted services. Includes coverage in effect, dates of inception and expiration, limits, and named insured.	Office controlling contractual relationship	Life of relationship with contractor + 6 years	Restricted

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
OPS-805	Operations	Contract and Lease Management	Documents the management of the terms and conditions of the company's contracts and leases for services, equipment, and real property. Includes copies of contracts / agreements, reports, correspondence, and related records. See also "Contracts and Agreements" (LGL-705) for any contractual agreements with the lessees / lessors.	Global Supply Chain; Office managing lease	Contract expiration + 6 years	Business Use
OPS-806	Operations	Crop Management	Documents the planning, planting, monitoring and harvesting of trees in the company's research plots. Includes data measurements, analyses, and related records. See also "Pesticide Applications" (EHS-320) for records documenting the use of chemicals to control unwanted insects and other pests and "Sales Orders" (SAM-908) for sales records.	Location	After harvest + 10 years	Business Use
OPS-807	Operations	Warehouse and Distribution	Documents the management of the operations at the warehouses used to receive and ship company products. Includes Third Party Consignment Inventory.	Global Supply Chain; Location	3 years	Business Use
OPS-808	Operations	Driver and Vehicle Inspections	Contains required Department of Transportation (DOT) inspections and remedial actions taken. Includes commercial driver's inspections of vehicle, roadside inspections, and trailer inspection.	Vehicle location	Roadside Inspections: 1 Year; Trailer and Driver's Inspections: 3 Months	Business Use
OPS-809	Operations	Driver Logs	Documents commercial driver's hours of service for Department of Transportation (DOT) reporting. Includes driver's logs that contain the name of the driver, dates, times, locations, and related information.	Vehicle location	6 months	Business Use
OPS-810	Operations	Equipment Maintenance	Documents repair and maintenance of equipment owned or leased by the company. Includes routine maintenance, preventive maintenance, scheduling, repairs, calibrations, inspections, analysis reports, logs, and related records.	Location	Maintenance, inspections, and repair records: Life of equipment + 10 years; Analysis reports and logs: No longer than 3 years	Business Use
OPS-811	Operations	Import / Export Control	Documentation of company compliance with customs regulations and other export requirements. Includes airway bills, Certificates of Origin, freight bills, loading documents, applications, authorizations, inventories, customs invoices, correspondence, and related records.	Shipping and / or Receiving location	5 Years from the date of import/export or until entry has been liquidated (i.e. settled) and associated duties tendered to U.S. Customs	Business Use
OPS-812	Operations	Internal and External Audits - Non Financial	Documents internal and external non-financial audits performed on company operations, sales, pricing, invoice, sustainability, customers, suppliers, and third parties audit. Includes reports, testing, peer reviews, self assessments and related records. See also "Financial Audits - External" (FIN-415) for financial related audits.	Department performing audit	Until superseded or outdated	Restricted

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
OPS-813	Operations	Inventory Management	Documents amount of goods, material document, consignment inventory, equipment and other company property. Includes inventory reports, cycle counts, reconciliations, and related records.	Office managing inventory	3 years	Business Use
OPS-814	Operations	Lot Samples	Contains specimens and samples used to test the quality of the company's products during production.	Location conducting test	No longer than 1 year	Business Use
OPS-815	Operations	Materials and Supplies Management	Documents management, requisition, receipt, consumption, and distribution of materials from company storerooms and locations. Includes requisitions, transfers, inventories, tallies, scale tickets (truck and paper Roll), scale ticket corrections, scrap tickets, weights, raw stock, chemical, shipping supplies, consignment inventory, rollstock and related records.	Office managing materials and / or supplies	6 years	Business Use
OPS-816	Operations	Planning and Scheduling	Documents production activities for management purposes. Includes demand planning, plans, schedules, downtime reporting, trim sheets, production orders, and other related records.	Production Location; Planner	3 years	Restricted
OPS-817	Operations	Project Management - Capital Projects	Documents capital improvement and renovation projects. Includes plans, drawings, studies, analyses, reports, approvals, cost estimates, project workpapers, copies of purchase orders and other accounts payable documentation, payments, and related records. See also "Facility and Equipment Plans and Drawings" (OPS-827) files for any buildings and assembly records related these capital projects and "Fixed Assets" (FIN-419) for accounting expenses.	Project Manager	Completed projects: 200 years; Unapproved projects: No longer than 12 years	Highly Restricted
OPS-818	Operations	Project Management - Process Improvement Projects	Documents operational or productivity improvements. Includes the project plans, meeting minutes, deliverables, and related records. See also "Project Management - Capital Projects" (OPS-817) for records related to capital projects; "Project Management - Information Systems" (ITL-605) for information systems project records; and "Project Management - Technology Projects" (TNL-1005) for product or technology projects.	Project Manager	Until superseded or outdated	Business Use
OPS-819	Operations	Right of Entry Permits and Licenses	Documents permission given to the public and others to access company property for social or recreational purposes. Includes applications, licenses and permits issued, and supporting records.	Office issuing permit	After expired + 10 years	Public
OPS-820	Operations	Sustainable Forestry Initiatives and Chain of Custody Management	Documents activities to meet the Sustainable Forestry Initiative, ISO 14001, and other product stewardship certifications and standards. Includes certifications, audits, monitoring, and related records.	Sustainability; Location	5 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
OPS-821	Operations	Transportation Carriers Management	Contains rate schedules, performance reviews, and other records used to manage the relationship with the company's transportation carriers. See also "Contracts and Agreements" (LGL-705) for any contractual agreements with the carriers and "Transportation Claims - Loss / Damage" (LGL-719) for the official shipment records.	Office managing relationship	Life of relationship + 3 years	Business Use
OPS-822	Operations	Transportation and Delivery	Contains data and records used to plan and coordinate the movement and delivery of products via truck, parcel, rail, and ocean shipments. Including post good issued. See also, "Shipping Documents" (OPS-801) for the official shipment records.	Global Supply Chain	3 years	Business Use
OPS-823	Operations	Vehicle Records	Contains registration, maintenance, inspections, and repair records of the company-controlled motor vehicles. Includes dispatcher's logs, registers, gasoline logs, and other related records. See also "Contracts and Agreements" (LGL-705) for lease agreements and "Vehicle Titles" (LGL-720) for vehicle ownership records.	Vehicle location; Corporate; ARI Fleet	Registrations: After expired + 6 years; Other records: 3 years	Business Use
OPS-824	Operations	Aircraft Operations and Maintenance	Documents the management of company aircraft. Includes titles, registrations, logbooks, aircraft engine records, inspections, maintenance records, incident reports, flight plans, and related records. See also "Fixed Assets" (FIN-419) for related financial records.	Aviation	After aircraft disposed of + 1 year or transfer to new owner	Business Use
OPS-825	Operations	Business Continuity	Documents business continuity and disaster planning. Includes actual plans, testing, and related records.	Location or Department	Until superseded	Restricted
OPS-826	Operations	Driver Qualification Records	Documents drivers' ability or qualifications to drive a commercial motor vehicle.	Vehicle location	Employee termination + 3 years	Business Use
OPS-827	Operations	Facility and Equipment Plans and Drawings	Documents design of company facilities and equipment. Includes plans and drawings, specifications, schematics, and related records. See also "Project Management - Capital Projects" (OPS-817) for the records related to planning and preliminary design phases of these projects.	Project Manager	Facilities: After sold, ownership transferred, or demolished + 6 years; Equipment: After disposition + 6 years	Business Use
OPS-828	Operations	Facility Plan	Documents planned changes in technology, equipment, or space to meet the long-range needs of the facility or operation.	Location	Until outdated + 6 years	Business Use
OPS-829	Operations	Pilot Qualification Records	Documents pilot's qualification to fly an aircraft. Includes records required by the Federal Aviation Administration (FAA) such as pilot proficiency checks, training, certifications, and related records.	Aviation	Employee termination + 3 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
OPS-830	Operations	Product Stewardship and Certification	Documents information provided to customers on annual certification of products and chemical constituents. Includes test results, life cycle assessments, certificates, approvals, attestations, and related records.	Sustainability	Test results, assessments, certifications, attestations, and approvals: Until superseded or outdated + 6 years; Other records: 6 years	Business Use
OPS-831	Operations	Quality Audits	Contains reports and documentation related to the audits of the company's quality assurance processes and systems.	Location audited	7 years	Business Use
OPS-832	Operations	Quality Certification	Documents measures taken by a plant to meet the quality requirements determined by the International Organization for Standardization (ISO) or other external standards organizations.	Location	Life of certification + 3 years	Business Use
OPS-833	Operations	Quality Control	Documents quality controls used on company products. Includes material and process assessments, tests, quality audits, certificates of analysis (COA), and related records.	Location conducting test	After warranty period expired + 6 years	Business Use
OPS-834	Operations	Railroad Records	Contains inspections, test and repair records, dispatch records, and hours of service records. See also "Equipment Maintenance" (OPS-810) for railroad equipment installation and modification records.	Operating location	5 years	Business Use
SAM-900	Sales/ Marketing	Competitive Intelligence	Documents intelligence gathered on competitors providing similar products and services. Includes reports, studies, analyses, trends, forecasts, and related records.	Marketing	Until superseded or outdated	Business Use
SAM-901	Sales/ Marketing	Customer Accounts Management	Documents customer-specific product requirements. Includes specifications, sample requests, technical records, job bags, and related information. See also "Contracts and Agreements" (LGL-705) for customer contracts; "Customer Complaints" (SAM-902) for records related to product and services complaints; and "Sales Orders" (SAM-908) for customer orders.	Sales; Technology; Customer Services	Life of relationship + 5 years	Highly Restricted
SAM-902	Sales/ Marketing	Customer Complaints	Contains customer complaints concerning company products and services. Covers all complaints - Pricing, Service, Quality, and Transportation. Includes complaints, company responses, and related records.	Office resolving the complaint	After resolved + 5 years	Business Use
SAM-903	Sales/ Marketing	Corporate Brand Management	Documents the development and usage of the names, signs or symbols that uniquely identify the company's products and services.	Marketing	After last use + 3 years	Business Use
SAM-904	Sales/ Marketing	Marketing and Advertising	Documents marketing campaigns and advertising of company products and services. Includes campaign development, reports, requests, studies, job files and jackets with specifications, advertisements, marketing collateral, surveys, and related records.	Marketing	After last use + 4 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
SAM-905	Sales/ Marketing	Pricing	Documents development of general and customer-specific pricing for products and services. Includes price lists, price rules, price models, price deviation approvals, documentation of physical price changes, and related records.	Office responsible for setting prices	Until superseded or outdated + 2 years	Highly Restricted
SAM-906	Sales/ Marketing	Product Development and Management	Documents development of product and service lines. Includes concepts, ideas, analyses, specifications, change authorizations, information sheets, implementation planning, commercialization rollouts, and related records. See also "Research and Laboratory Notebooks" (TNL-1006) for technical product research files and "Product and Process Testing" (TNL-1007) for product and process testing records.	Marketing; Technology	Life of product line + 1 year	Restricted
SAM-907	Sales/ Marketing	Sales Account Management	Contains correspondence, quotations, proposals, and other records used to target and manage customer sales accounts. See also "Contracts and Agreements" (LGL-705) for the official customer contracts.	Sales	Customers: After last use + 6 years; Unsold prospects: 4 years	Highly Restricted
SAM-908	Sales/ Marketing	Sales Orders	Documents sales orders submitted for the company's products and services. Includes purchase requests, confirmations, proofs, order updates, inquiries, customer communications, and related records.	Sales; Customer Services	5 years	Business Use
SAM-909	Sales/ Marketing	Sales Promotions	Documents sales promotions targeted to customers, sales representatives, or distribution channel members. Includes plans, analyses, and related records.	Sales	Until promotion expires	Business Use
SAM-910	Sales/ Marketing	Market Research	Documents market research done on products, services, and customers. Includes reports, studies, analyses, surveys, and related records.	Marketing	Until superseded or outdated	Restricted
SAM-911	Sales/ Marketing	Prospect Management	Contains identification and qualification of prospective customers for company goods and services.	Office managing leads	Until superseded or outdated	Business Use
TNL-1000	Technology	Conservation Management	Documents planning and reporting to support conservation management. Includes tracking requirements under the Endangered Species Act and related records.	Reporting Location	10 years	Business Use
TNL-1001	Technology	Equipment Information	Contains records pertaining to equipment and parts installed in the manufacturing locations. Includes manuals, catalogs, specification sheets, warranties, machine metadata such as machine asset number, make, model, equipment type, and serial number and related records. See also "Facility and Equipment Plans and Drawings" (OPS-827) for schematics, diagrams, and other equipment-related drawings.	Location	Life of equipment + 10 years	Business Use
TNL-1002	Technology	Manufacturing Equipment and Process Standards	Contains manufacturing equipment and process standards in force at the company.	Technology	Until superseded or outdated + 15 years	Business Use

RECORDS RETENTION POLICIES

Records Series ID	Records Function	Records Series Name	Records Series Description	Office of Record	Official Version Retention	Data Classification
TNL-1003	Technology	Manufacturing Instructions	Contains descriptions of the various manufacturing processes utilized in the company's plants (such as sequence of operations, procedure controls points, and monitoring methods). Includes data reporting methods, acceptance numbers, corrective action plans for nonconformity, and related records.	Technology	Until superseded or outdated + 15 years	Business Use
TNL-1004	Technology	Manufacturing Materials Specifications	Documents specifications for the raw materials used in the production of the company's products.	Technology	Until superseded or outdated + 15 years	Business Use
TNL-1005	Technology	Project Management - Technology Projects	Documents the projects undertaken to develop or improve new products or services, enhance production processes, and improve reliability. Includes samples, models, statistical analysis, memos, studies, computer models, raw data specifications, and related records. See also "Research and Laboratory Notebooks" (TNL-1006) for official technology development records and "Facility and Equipment Plans and Drawings" (OPS-827) for official design and construction records.	Technology Project Manager	Approved: After project completed + 15 years; Non-approved: No longer than after final decision + 7 years	Business Use
TNL-1006	Technology	Research and Laboratory Notebooks	Documents scientific, technical, and experimental work completed concerning the company's research, development, and process improvement activities. Includes laboratory notebooks, test results, reports, technical research data, and supporting records. See also "Project Management - Technology Projects" (TNL-1005) for project-related progress report.	Technology	200 years	Highly Restricted
TNL-1007	Technology	Product and Process Testing	Documents testing done on the company's products and processes. Includes tests and measurements, results, analyses, reports, and related records. See also "Quality Control" (OPS-833) for quality control testing and inspections performed at the manufacturing locations.	Technology	No longer than 10 years	Business Use

a longer period appears below.

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Date Effective	Department/Division	Page Number		
10/27/89	GENERAL SCHEDULE FOR ALL DEPARTMENTS	1		
Supersedes	Section	RETENTION PERIODS (YEARS) (Unless specified otherwise)		
RECORD TITLE		OFFICE	STORAGE	TOTAL
<u>Introduction</u>				
This schedule covers retention of records found in all or many departments throughout International Paper. Use this General Schedule along with the schedule covering the records for your facility or department.				
The Department of Record is the department responsible for maintaining the records shown (or the same information) for longer retention periods. <u>The Department of record will not follow this schedule for the records shown, but all other departments will.</u>				
Records listed here shall not be eligible for storage or for microfilming. Accordingly, the records shall be destroyed in the office when the Retention Period expires.				
Special codes used here are:				
C+1-2	Current year and one to two years prior			
DR	Department of Record			
MAX	Maximum period allowed. Records may be destroyed earlier.			
1. Associations, Societies & Clubs Activities Records--Not reimbursed by IP.	C+2			C+2
2. Associations, Societies & Clubs Activities Records--Reimbursed by IP.	OTY			OTY
3. Budget Submission Files & Report. Expense or Capital. DR Budget & Analysis	C+2			C+2
4. Cash & Checks Received Logs. DR Treasurer	C+2			C+2
5. Chronological or Reading Files of Correspondence.	MAX C+1			MAX
6. Company Policy and Procedure Manuals, Directories & Letters of Instruction DR Office Where Issued.	S			S
7. Company Publications, Including Annual Reports, Brochures, Newsletters and Press Releases. DR Office Where Issued.	MAX C+2			MAX
8. Corporate Planning Reports. DR Corporate Planning & Development.	C+1			C+1
9. Desk Calendar and Diaries	C+1			C+1
10. Expense Reports and Files. DR Controller or Disbursing Agent.	C+2			C+2
11. Financial Reports Received. DR Controller. Monthly. Quarterly. Year End	MAX C+12M MAX C+12M MAX C+2			MAX MAX MAX
12. Five Year Plan Submissions. DR Controller	C+1			C+1
13. General Correspondence Files.	MAX C+2			MAX
14. Information Files, Topical Files for Information Purposes.	MAX C+2			MAX
15. Management Reports Submitted. DR Controller.	C+1			C+1

DEPARTMENTS/DIVISIONS
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a longer period appears below.

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Date Effective 10/27/89	Department/Division GENERAL SCHEDULE FOR ALL DEPARTMENTS	Page Number 2		
Supersedes	Section	RETENTION PERIODS (YEARS) (Unless specified otherwise)		
RECORD TITLE		OFFICE	STORAGE	TOTAL
16.	Meetings & Conferences Records.	MAX C+2		MAX C+2
17.	Name, Address & Telephone Card & Lists.	S		S
18.	Payment Submission Files. Include voucher copies, bills & check requests. DR Controller or Disbursing Agent.	C+2		C+2
19.	PC & WP Files: Databases & Spreadsheets. Used in last 36 mo. Not used for 36 mo.	SUSPENSE ERASE		SUSPENS ERASE
20.	PC & WP Files: Documents non-repetitive.	MAX C+2		MAX C+2
21.	PC & WP Files: Documents Repetitive. Used in last 12 mo. Not used in last 12 mo.	SUSPENSE ERASE		SUSPENS ERASE
22.	PC & WP Files: Electronic Mail Messages. DR MIS Until seen by user. Seen by user.	SUSPENSE ERASE		SUSPENS ERASE
23.	Personnel Files-Local. DR Human Resources. Current Employee Former Employee	SUSPENSE C+1		SUSPENS C+1
24.	Petty Cash Paid Checks & Checkbooks.	OTY		OTY
25.	Purchasing Submission Files. Include requisitions. DR Logistics or Purchasing Agent.	C+2		C+2
26.	Sales Reports. DR Controller. Monthly. Quarterly. Year End.	MAX C+12M MAX C+12M MAX C+2		MAX C+1 MAX C+1 MAX C+2
27.	Telephone Bill Copies & Telephone Activity Files & Reports.	C+2		C+2
28.	Telephone Call Logs.	MAX C+1		MAX C+1
29.	Time & Attendance Reports.	OTY		OTY
30.	Travel Schedule	MAX C+1		MAX C+1
31.	Vehicle Records--Automobiles. DR Controller.	OTY		OTY
32.	Vehicle Records--Trucks. DR Logistics.	OTY		OTY
33.	Vendor Information Files. DR Logistics or Purchasing Agent.	MAX C+2		MAX C+2
34.	Weekly Status Reports.	MAX C+1		MAX C+1
35.	Work (Personal) Files of Former Employees.	MAX C+1		MAX C+1

Default Retention Policy. Destroy all records within C+2, unless a longer period appears below

DEPARTMENTS/DIVISIONS

INTERNATIONAL  PAPER

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Date Effective	Department/Division	Page Number		
05/01/98	GENERAL SCHEDULE FOR ALL DEPARTMENTS	1		
Supersedes	Section	RETENTION PERIODS (YEARS)		
10/27/89		(Unless specified otherwise)		
RECORD TITLE		OFFICE	STORAGE	TOTAL
<u>Introduction</u>				
This schedule covers retention of records found in all or many departments throughout International Paper. Use this General Schedule along with the schedule covering the records for your facility or department.				
The Department of Record is the department responsible for maintaining the records shown (or the same information) for longer retention periods. <u>The Department of Record will not follow this schedule for the records shown</u> , but all other departments will.				
Records listed here shall not be eligible for storage or for microfilming. Accordingly, the records shall be destroyed in the office when the Retention Period expires.				
Special codes used here are:				
C+1-2 Current year and one to two years prior				
DR Department of Record				
MAX Maximum period allowed. Records may be destroyed earlier.				
1. Associations, Societies & Clubs Activities Records--Not Reimbursed by IP.		C+2		C+2
2. Associations, Societies & Clubs Activities Records--Reimbursed by IP.		OTY		OTY
3. Budget Submission Files & Report. Expense or Capital. DR Budget & Analysis		C+2		C+2
4. Cash & Checks Received Logs. DR Treasurer		C+2		C+2
5. Chronological or Reading Files of Correspondence.		MAX C+1		MAX C+1
6. Company Policy and Procedure Manuals, Directories & Letters of Instruction. DR Office Where Issued.		S		S
7. Company Publications, Including Annual Reports Brochures, Newsletters and Press Releases. Dr Office Where Issued.		MAX C+2		MAX C+2
8. Corporate Planning Reports. DR Corporate Planning & Development.		C+1		C+1
9. Desk Calendar and Diaries		C+1		C+1
10. Expense Reports and Files. DR Controller or Disbursing Agent.		C+2		C+2
11. Financial Reports Received. DR Controller				
Monthly.		MAX CM+12M		MAX CM+12M
Quarterly.		MAX CM+12M		MAX CM+12M
Year End.		MAX C+2		MAX C+2
12. Five Year Plan Submissions. DR Controller		C+1		C+1
13. General Correspondence Files.		MAX C+2		MAX C+2
14. Information Files, Topical Files for Information Purposes.		MAX C+2		MAX C+2
15. Management Reports Submitted. DR Controller.		C+1		C+1
16. Meetings & Conferences Records		MAX C+2		MAX C+2
17. Name, Address & Telephone Card & Lists.		S		S

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DEPARTMENTS/DIVISIONS

INTERNATIONAL  PAPER

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Date Effective	Department/Division	Page Number		
05/01/98	GENERAL SCHEDULE FOR ALL DEPARTMENTS	2		
Supersedes	Section	RETENTION PERIODS (YEARS) (Unless specified otherwise)		
10/27/89				
RECORD TITLE		OFFICE	STORAGE	TOTAL
18. Payment Submission Files. Include voucher copies, bills & check requests. DR Controller or Disbursing Agent.		C+2		C+2
19. PC & WP Files: Databases & Spreadsheets. Used in Last 36 mo. Not Used for 36 Mo.		SUSPENSE ERASE		SUSPENSE ERASE
20. PC & WP Files: Documents Non-Repetitive.		MAX C+2		MAX C+2
21. PC & WP Files: Documents Repetitive. Used in Last 12 Mo. Not Used in Last 12 Mo.		SUSPENSE ERASE		SUSPENSE ERASE
22. PC & WP Files: Electronic Mail Messages. DR MIS Until Seen by User. Seen by User.		SUSPENSE MAX 3M		SUSPENSE MAX 3M
23. Personnel Files-Local. DR Human Resources. Current Employee Former Employee		SUSPENSE C+1		SUSPENSE C+1
24. Petty Cash Paid Checks & Checkbooks.		OTY		OTY
25. Purchasing Submission Files. Include Requisitions, DR Logistics or Purchasing Agent.		C+2		C+2
26. Sales Reports. DR Controller. Monthly. Quarterly. Year End.		MAX CM+12M MAX CM+12M MAX C+2		MAX CM+12M MAX CM+12M MAX C+2
27. Telephone Bill Copies & Telephone Activity Files & Reports.		C+2		C+2
28. Telephone Call Logs.		MAX C+1		MAX C+1
29. Time & Attendance Reports.		OTY		OTY
30. Travel Schedules.		MAX C+1		MAX C+1
31. Vehicle Records--Automobiles. DR Controller.		OTY		OTY
32. Vehicle Records--Trucks. DR Logistics.		OTY		OTY
33. Vendor Information Files. DR Logistics or Purchasing Agent.		MAX C+2		MAX C+2
34. Weekly Status Reports.		MAX C+1		MAX C+1
35. Work (Personal) Files of Former Employees.		MAX C+1		MAX C+1

International Paper

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Default Retention Policy: Destroy all records within C+2, unless a longer period appears below.

INTRODUCTION

This schedule covers the retention of records found in all or many Sites throughout International Paper. Use this General Schedule along with the Department/Division Records Retention Schedule covering the records for your specific Site(s).

The Department of Record is the department responsible for maintaining the records shown (or the same information) for longer retention periods.

The Department of Record will not follow this schedule for the records shown, but all other departments will.

Records listed here shall not be eligible for storage or for microfilming. Accordingly, the records shall be destroyed in the office when the Retention Period expires.

Special codes used here are:

C+1-2 Current year and one to two years prior

DR Department of Record

MAX Maximum period allowed. Records may be destroyed earlier.

Essential is defined as e-mail containing content necessary for ongoing job function or providing current or future value to the Company.

Office Code: **SUSPENSE**

Non-Essential is defined as e-mail not necessary to be retained for ongoing job functions or future business value. Office Code: **Max 90 days**

Date Effective		Department/Division			Page No.
4/1/2003 1:00:00 AM		Company Policies & Procedures			1
Supersedes		Section			
1/1998		General Schedule for All Departments			
	RECORD TITLE	OFFICE	STORAGE	TOTAL	
1.1	Associations, Societies & Clubs Activities Records - Not Reimbursed by IP.	C+2		C+2	
1.2	Associations, Societies & Clubs Activities Records - Reimbursed by IP.	OTY		OTY	
1.3	Budget Submission Files & Report. Expense or Capital. DR Budget & Analysis.	C+2		C+2	
1.4	Cash & Checks Received Logs. DR Treasurer.	C+2		C+2	
1.5	Chronological or Reading Files of Correspondence.	MAX C+1		MAX C+1	
1.6	Company Policy and Procedure Manuals, Directories & Letters of Instruction. DR Office Where Issued.	S		S	
1.7	Company Publications, Including Annual Reports, Brochures, Newsletters and Press Releases. DR Office Where Issued.	MAX C+2		MAX C+2	
1.8	Corporate Planning Reports. DR Corporate Planning & Development.	C+1		C+1	
1.9	Diaries and Calendars	--		--	
	Electronic Calendars, Journals, and To-Do Lists	MAX C+1		MAX C+1	
	Desk Calendars and Diaries	C+1		C+1	

International Paper

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Default Retention Policy: Destroy all records within C+2, unless a longer period appears below.

Date Effective 4/1/2003 1:00:00 AM		Department/Division Company Policies & Procedures			Page No. 2	
Supersedes 5/1/1998		Section General Schedule for All Departments				
	RECORD TITLE		OFFICE	STORAGE	TOTAL	
1.10	Expense Reports and Files. DR Controller or Disbursing Agent.		C+2		C+2	
1.11	Financial Reports Received.		--		--	
	Financial Reports Received. Monthly DR Controller.		MAX CM+12M		MAX CM+12M	
	Financial Reports Received. Quarterly DR Controller.		MAX CM+12M		MAX CM+12M	
	Financial Reports Received. Year End DR Controller.		MAX C+2		MAX C+2	
1.12	Five Year Plan Submissions. DR Controller.		C+1		C+1	
1.13	General Correspondence Files.		MAX C+2		MAX C+2	
1.14	Information Files, Topical Files for Information Purposes.		MAX C+2		MAX C+2	
1.15	Management Reports Submitted. DR Controller.		C+1		C+1	
1.16	Meetings & Conferences Records.		MAX C+2		MAX C+2	
1.17	Name, Address & Telephone Card & Lists.		S		S	
1.18	Payment Submission Files. Include voucher copies, bills & check requests. DR Controller or Disbursing Agent.		C+2		C+2	
1.19	RESERVED FOR FUTURE USE.		--		--	
1.20	RESERVED FOR FUTURE USE.		--		--	
1.21	Electronic Records and Files.		--		--	
	Electronic Records and Files (including those having .wav, .gif, .tif, .jpg, .bmp, .doc, .xls, .ppt, .mpp, .htm, .pub, .mdb, .vsd, .txt, .rtf, .pdf, .csv, or .zip extensions), excluding E-mail Messages. Used in Last 36 months.		SUSPENSE		SUSPENSE	

International Paper

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Date Effective 4/1/2003 1:00:00 AM		Department/Division Company Policies & Procedures			Page No. 3
Supersedes 5/1/1998		Section General Schedule for All Departments			
	RECORD TITLE	OFFICE	STORAGE	TOTAL	
	Electronic Records and Files (including those having .wav, .gif, .tif, .jpg, .bmp, .doc, .xls, .ppt, .mpp, .htm, .pub, .mdb, .vsd, .txt, .rtf, .pdf, .csv, or .zip extensions), excluding E-mail Messages. Not Used in Last 36 months.	ERASE		ERASE	
1.22	Electronic E-mail Messages.	--		--	
	Electronic E-mail Messages. Essential DR IT.	SUSPENSE		SUSPENSE	
	Electronic E-mail Messages. Non-Essential DR IT.	MAX 3 M		MAX 3 M	
1.23	Personnel Files - Local.	--		--	
	Personnel Files - Local. Current Employee DR Human Resources.	SUSPENSE		SUSPENSE	
	Personnel Files - Local. Former Employee DR Human Resources.	C+1		C+1	
1.24	Petty Cash Paid Checks & Checkbooks.	OTY		OTY	
1.25	Purchasing Submission Files. Include Requisitions. DR Logistics or Purchasing Agent.	C+2		C+2	
1.26	Sales Reports.	--		--	
	Sales Reports. Monthly DR Controller.	MAX CM+12M		MAX CM+12M	
	Sales Reports. Quarterly DR Controller.	MAX CM+12M		MAX CM+12M	
	Sales Reports. Year End DR Controller.	MAX C+2		MAX C+2	
1.27	Telephone Bill Copies & Telephone Activity Files & Reports.	C+2		C+2	
1.28	Telephone Call Logs.	MAX C+1		MAX C+1	
1.29	Time & Attendance Reports.	OTY		OTY	
1.30	Travel Schedules.	MAX C+1		MAX C+1	

International Paper

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Default Retention Policy: Destroy all records within C+2, unless a longer period appears below.

Date Effective 4/1/2003 1:00:00 AM		Department/Division Company Policies & Procedures			Page No. 4
Supersedes 5/1/1998		Section General Schedule for All Departments			
	RECORD TITLE	OFFICE	STORAGE	TOTAL	
1.31	Vehicle Records - Automobiles. DR Controller.	OTY		OTY	
1.32	Vehicle Records - Trucks. DR Logistics.	OTY		OTY	
1.33	Vendor Information Files. DR Logistics or Purchasing Agent.	MAX C+2		MAX C+2	
1.34	Weekly Status Reports.	MAX C+1		MAX C+1	
1.35	Work (Personal) Files of Former Employees.	MAX C+1		MAX C+1	

RECORDS MANAGEMENT COMPLIANCE**3. Summary Report – Records Policies****All Retention Policies****NOVEMBER 1, 2008**

<u>RECORDS SERIES ID</u>	<u>RECORDS FUNCTION</u>	<u>RECORDS SERIES NAME / TITLE</u>	<u>OFFICE OF RECORD</u>	<u>OFFICIAL VERSION RETENTION</u>	<u>COPIES VERSION RETENTION</u>
00901.0	Administrative	Administrative Support	Department	Maximum of 3 Years	N/A
00950.0	Administrative	Buildings and Grounds Security	Location	Maximum of 3 Years	Maximum of 1 Year
00934.0	Administrative	Internal Operational / Management Reporting	Office Preparing Report	Maximum of 5 Years	Maximum of 3 Years
00919.0	Administrative	Meeting Management & Participation	Meeting Chair	Committees: Life of Committee + 3 Years; Non- Committees: Maximum of 3 Years	Maximum of 3 Years
00922.0	Administrative	Policies, Procedures, Guidelines and Processes	Office of Issuance	Compliance, EHS & HR Policies: 6 Years After Outdated or Superseded; All Others: Until Outdated or Superseded	Until Outdated
00933.0	Administrative	Policies, Procedures, Guidelines and Processes - Records Management	Legal	Legacy Retention Policies: 25 Years; Master Policies: 6 Years After Outdated or Superseded; Departmental Retention Schedules: 1 Year After Outdated or Superseded	Until Outdated or Superseded
00929.0	Administrative	Presentations and Speeches	Office Delivering the Presentation / Speech	Historically Significant: Permanent; All Others: Maximum of Last Use + 3 Years	Maximum of 3 Years
00926.0	Administrative	Records Storage & Destruction	Office Responsible for Records	On-Site Records: 10 Years After Destruction; Off-Site Records: 10 Years After Destruction of Box Contents	Maximum of 3 Years

RECORDS MANAGEMENT COMPLIANCE**3. Summary Report – Records Policies****All Retention Policies****NOVEMBER 1, 2008**

<u>RECORDS SERIES ID</u>	<u>RECORDS FUNCTION</u>	<u>RECORDS SERIES NAME / TITLE</u>	<u>OFFICE OF RECORD</u>	<u>OFFICIAL VERSION RETENTION</u>	<u>COPIES VERSION RETENTION</u>
00927.0	Administrative	Reference Materials	Department	Until Superseded or Of No Value	N/A
00935.0	Administrative	Service Requests	Department Processing Request	Maximum of 3 Years	Maximum of 1 Year
00945.0	Administrative	Surveys	Office Conducting Survey	Maximum of 3 Years	Maximum of 1 Year
11006.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures	Corporate Secretary (Filings and Closing Documents); Office Responsible for Managing Due Diligence Process (Other Records)	Filings and Closing Documents: Permanent; Other Records, including Due Diligence: 2 Years After Transaction, Claims / Warranty Period Expiration or Abandonment of Transaction; Prospective Deals: Maximum of 10 Years After Last Consideration	Maximum of 2 Years After Transaction Completion
11117.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Transition Services	Office Managing Client Relationship	LONGER of: 15 Years or As Required by Contractual Agreement with Client	Maximum of 3 Years
11119.0	Corporate	Asset Management	Information Technology; Office Management	Maximum of 7 Years After Disposal of Equipment	Maximum of Equipment Life
11003.0	Corporate	Board and Committees Minute Books and Records	Corporate Secretary (IP and US Subsidiaries); Responsible Party (Non-US Subsidiaries)	Permanent	Maximum of Entity Life + 2 Years
11102.0	Corporate	Charitable Contributions	Office Approving Contribution	Approved and Tax Deductible: 15 Years; Denied or Non-Tax Deductible: Maximum of 3 Years	Maximum of 3 Years

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11103.0	Corporate	Communications - External	Office Issuing the Communication	Historically Significant: Permanent; All Others: Maximum of 10 Years	Maximum of 3 Years
11104.0	Corporate	Communications - Internal	Office Issuing the Communication	Maximum of 5 Years	Maximum of 3 Years
11105.0	Corporate	Company Performance Reporting	Investor Relations	6 Years	Maximum of 3 Years
11007.0	Corporate	Compensation Planning Records - Directors	Corporate Secretary	Until Financial Obligations Cease + 15 Years	Maximum of 3 Years
11019.0	Corporate	Corporate Organization and Ownership	Corporate Secretary	Permanent	Maximum of 3 Years
11021.0	Corporate	Delegation of Authority	Office Controlling the Delegation Authority	Until Obsolete or Superseded	Until Obsolete or Superseded
11022.0	Corporate	Directors and Officers - Selection and Retention	Corporate Secretary	Permanent	Maximum of 3 Years
11106.0	Corporate	Event Management	Office Managing the Event	Board-related Events: 10 Years; Other Events: Maximum of 5 Years After Event	Maximum of 3 Years
11107.0	Corporate	Executive Biographies	Communications	Duration of Employment + 10 Years	Maximum of Employment Duration
11108.0	Corporate	Foundation Management	Foundation	Life of the Foundation + 15 Years	Maximum of 3 Years
11120.0	Corporate	Governmental Lobbying / Influence Activities	Government Relations	Maximum of 6 Years	Maximum of 3 Years

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11109.0	Corporate	Image Management	Office Responsible for Controlling Image Access	Until Outdated or Superseded	Maximum of 3 Years
11110.0	Corporate	Industry Reporting	Office Submitting Report	Maximum of 10 Years	Maximum of 3 Years
11111.0	Corporate	Legislative Tracking	Government Relations	Perennial Issues: Until Outdated or Superseded; Other Records: Maximum of 6 Years	Maximum of 3 Years
11035.0	Corporate	Licenses, Registrations and Certifications	Corporate Secretary	Permanent	Maximum of 3 Years
11036.0	Corporate	Markets Listings	Corporate Secretary	Permanent	Maximum of 3 Years
11112.0	Corporate	Media Coverage	Communications	Maximum of 10 Years	Maximum of 3 Years
11113.0	Corporate	Political Action Committee Management	Government Relations	Fundraising Records: 15 Years; Other Records: Maximum of 6 Years	Maximum of 3 Years
11114.0	Corporate	Public Information Requests	Investor Relations	Request & Response: Maximum of 6 Years; Distribution Copies of Company Publications: Maximum of 10 Years	Maximum of 3 Years
11116.0	Corporate	Stockholder Records	Corporate Secretary	Permanent	Maximum of 3 Years
11051.0	Corporate	Stockholder Records - Shareholder Listings	Corporate Secretary	6 Years	Maximum of 3 Years
09150.0	Environment, Health & Safety	Citations and Notices of Violations (NOVs)	Location	3 Years After Resolution	Until Resolution
09005.0	Environment, Health & Safety	Emergency and Accident Prevention Planning	Location	Until Outdated or Superseded + 5 Years or Per Permit	Until Outdated or Superseded

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09270.0	Environment, Health & Safety	Environmental Credits	Corporate Environment, Health & Safety	15 Years	Maximum of 3 Years
09015.0	Environment, Health & Safety	Environmental Monitoring, Inspection and Testing	Location	Groundwater: Post Closure Care Period; PCBs: 7 Years or Last Disposal + 3 Years; All Others: 10 Years or Per Permit	Maximum of 3 Years
09025.0	Environment, Health & Safety	Environmental Permits	Location	Solid Waste: End of Post- Closure Care Period; All Other Permit Types: Until Superseded	Maximum of Permit Duration
09035.0	Environment, Health & Safety	Environmental Program Management	Corporate Environment, Health & Safety; Location	Until Outdated or Superseded	Maximum of 3 Years
09160.0	Environment, Health & Safety	Equipment Safety Inspections & Tests	Location	Fire Protection Equipment: Shorter of: Life of System / Equipment or Inspection / Test Cycle; Boilers & Pressure Vessels: Equipment Life; Radiographic Devices: 5 Years; Other Equipment: 2 Years	Maximum of 2 Years
09055.0	Environment, Health & Safety	Hazardous Materials Removal Project Management	Location	Project Completion + 30 Years	Maximum of 3 Years After Project Completion
09260.0	Environment, Health & Safety	Incident Tracking	Corporate Environment, Health & Safety; Location	Maximum of 10 Years	Maximum of 3 Years
09065.0	Environment, Health & Safety	Industrial Hygiene	Location	Noise Testing and Corrective Action Plans: 2 Years; All Other Records: 40 Years	Maximum of 3 Years

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09085.0	Environment, Health & Safety	Internal Audits and Assessments - Environment, Health & Safety	Location	Process Safety Management [PSM] Audits: Last 2 Audits; Other Audits: Until Corrective Action Plan [CAP] Developed; Current / Final CAP: Until Superseded or Certified	Until Outdated or Superseded
09090.0	Environment, Health & Safety	Licenses, Registrations, Accreditations and Certifications - EHS	Location	Expiration + 5 Years	Until Expiration
09045.0	Environment, Health & Safety	Material Safety Data Sheets (MSDS) and Hazardous Materials Communications	Location Using Hazardous Materials	Until Outdated + 30 Years	Until Outdated
09080.0	Environment, Health & Safety	Medical Records	Human Resources Manager; Health Services or Designee	Duration of Employment + 30 Years	Maximum of Duration of Employment
09110.0	Environment, Health & Safety	Occupational Injury and Illness	Location	6 Years	Maximum of 3 Years
09120.0	Environment, Health & Safety	Pest Control	Location	7 Years	Maximum of 3 Years
09140.0	Environment, Health & Safety	Regulatory Reporting - Environmental	Location	Landfills: Facility Closure + 3 Years; All Others: 10 Years	Maximum of 3 Years
09100.0	Environment, Health & Safety	Safety Committee Meetings	Safety Office; Meeting Location	3 Years	Maximum of 3 Years
09170.0	Environment, Health & Safety	Safety Permits	Location	1 Year	Maximum of 1 Year
09180.0	Environment, Health & Safety	Safety Program Management	Safety Office	Until Outdated or Superseded	Maximum of 3 Years

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09190.0	Environment, Health & Safety	Spills and Releases	Location	CERCLA / Superfund: Permanent; PCBs: Last Use + 3 Years; All Others: 10 Years	Maximum of 3 Years
09200.0	Environment, Health & Safety	Storage Tanks	Location	Life of Tank + 10 Years	Maximum of Tank Life
09210.0	Environment, Health & Safety	Toxic Substances Control	Location	5 Years	Maximum of 3 Years
09230.0	Environment, Health & Safety	Waste Facility Closures	Corporate Environment, Health & Safety; Location	Facility Closure Certification + Required Post-Closure Period	Until Outdated or Superseded
09240.0	Environment, Health & Safety	Waste Processing	Location	Hazardous Waste: LONGER of: Facility Closure or Duration of Ownership; Other Wastes: 5 Years	Maximum of 3 Years
09250.0	Environment, Health & Safety	Waste Shipment and Transportation	Location	Hazardous Waste: Permanent; Non-Hazardous or other Toxic Substances: 6 Years	Maximum of 3 Years
09075.0	Environment, Health & Safety	Workers Compensation Claims	Claims Administrator	Last Payment + 12 Years	Maximum of 3 Years After Last Payment
02004.0	Finance	Accounting Policies & Interpretations	Corporate Accounting; Financial Reporting	Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
02024.0	Finance	Accounting Records - Assets	Tax; Office Responsible for Asset Accounting	15 Years After Final Disposition of Asset / Obligation	Maximum of Asset / Obligation Life
02055.0	Finance	Accounting Records - General	Office Responsible for Processing or Reconciling Transactions	General Ledger: Permanent; All Other Records: 15 Years	Maximum of 3 Years

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02012.0	Finance	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Financial Analysis	Corporate Accounting; Financial Reporting; Planning & Analysis; Office Responsible for Managing Due Diligence Process	Life of Ownership / Participation + 15 Years	Maximum of 3 Years After Transaction Completion
02008.0	Finance	Bank Relationship Files	Treasury	Contract Obligations + 15 Years	Maximum of Life of Relationship
02009.0	Finance	Bond Coverage Records	Global Risk Management	Contract Obligations + 6 Years	Maximum of Life of Bond
02010.0	Finance	Budget and Financial Planning	Budget & Analysis	5 Years	Maximum of 5 Years
02013.0	Finance	Corporate Credit Cards	Finance Operations; Service Provider	Termination / Expiration + 6 Years	Maximum of 3 Years
02015.0	Finance	Customer Credit Records	Credit; Controlling Office	Account Close + 15 Years	Maximum of 3 Years
02016.0	Finance	Debt Instruments	Treasury; Controlling Office	Life of Obligation + 15 Years	Maximum of Life of Obligation
02017.0	Finance	Debt Management	Treasury	15 Years	Maximum of 3 Years
02018.0	Finance	Derivatives and Other Treasury Transactions	Treasury; Financial Accounting	Termination / Expiration + 15 Years	Maximum of 3 Years
02019.0	Finance	External Financial Audits	Corporate Accounting; Financial Reporting; Office Audited	7 Years	Until Next Audit
02021.0	Finance	Financial Analysis	Corporate Accounting; Financial Reporting; Planning & Analysis; Local Accounting Office	Maximum of 10 Years	Maximum of 5 Years

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02020.0	Finance	Financial Guarantees	Treasury	Life of Obligation + 15 Years	Maximum of Life of Obligation
02022.0	Finance	Financial Statements	Corporate Accounting; Financial Reporting; Tax; Office Preparing Statement	Audited, Annual Consolidated Statements: Permanent; Quarterly Statements: 15 Years; Monthly Statements: Maximum of 5 Years	Maximum of 3 Years
02052.0	Finance	Imputed Income	Human Resources Service Center; Office Responsible for Calculation	15 Years	Maximum of 3 Years
02026.0	Finance	Insurance Policies	Global Risk Management; Office Securing Policy	Liability Policies: Permanent; Non-Liability Policies: 6 Years	Maximum of 3 Years
02027.0	Finance	Intellectual Property - Royalties	Legal	Life of Licensing Agreement + 15 Years	Maximum of 3 Years
02028.0	Finance	Internal Audits	Department Performing Audit	7 Years	Until Next Audit
02056.0	Finance	Internal Control Documentation	Department	7 Years	N/A
02030.0	Finance	Investment Management	Treasury	Life of Ownership + 15 Years	Maximum of 3 Years
02031.0	Finance	Investment Performance	Trust Investments	15 Years	Maximum of 3 Years
02049.0	Finance	Manufacturing Costs	Office Responsible for Cost Determination	Maximum of 15 Years	Maximum of 3 Years
02119.0	Finance	Purchase Orders	Office Responsible for Purchase Order Issuance	15 Years	Maximum of 3 Years

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02051.0	Finance	Regulatory Compliance - Financial Control Plans	Finance; Information Technology	Until Obsolete or Superseded + 15 Years	Maximum of 3 Years
02035.0	Finance	Regulatory Reporting - Financial Certifications	Legal	15 Years	Maximum of 3 Years
02115.0	Finance	Regulatory Reporting - SEC Filings	Corporate Secretary; Corporate Accounting; Financial Reporting	Published Versions: Permanent; Supporting Records: 15 Years	Maximum of 3 Years
02032.0	Finance	Risk Management Location Files	Global Risk Management	Until Outdated or Superseded	Maximum of 3 Years
02029.0	Finance	Standard Control Reports	Department	Annual, Semi-Annual & Quarterly Reports: 1 Year; Monthly Reports: 6 Months; Daily & Weekly Reports: 3 Months	N/A
02037.0	Finance	State Sales Tax Exemption Certificates	Tax; Controlling Office	Expiration + 15 Years	Maximum of 3 Years
02040.0	Finance	Tax Audit Files	Tax	15 Years After Settlement of Tax Audits	Maximum of 3 Years
02041.0	Finance	Tax Filings - Returns and Workpapers	Office Submitting Filing	Returns & Schedules, excluding Sales & Use and Excise Returns: Permanent; Other Records: 15 Years After Settlement of Tax Audits	Maximum of 3 Years
02042.0	Finance	Tax History Files	Tax	Permanent	Maximum of 3 Years
02043.0	Finance	Tax Identification Certification - W-9s	Finance Operations	15 Years	Maximum of 3 Years

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02044.0	Finance	Tax Informational Reporting	Finance Operations; Human Resources Service Center	15 Years	Maximum of 3 Years
02033.0	Finance	Tax Location Files	Tax	Until Outdated or Superseded	Maximum of 3 Years
02045.0	Finance	Tax Matters Files	Tax	Until Outdated or Superseded	Maximum of 3 Years
02046.0	Finance	Unclaimed Property Reports	Financial Reporting	15 Years	Maximum of 3 Years
03001.0	Human Resources	Affirmative Action Plans	EEO Compliance Office	Consolidated Plans and Reports: 4 Years; Local Records: Current Plan + 2 Prior Plans	Maximum of 3 Years
03004.0	Human Resources	Benefit Plans	Benefits Administration	Health and Welfare Plan Working Papers: Plan Obligations + 6 Years; All Other Records: Permanent	Maximum of Plan Obligations
03006.0	Human Resources	Benefit Plans Claims Administration	Benefits Administration	15 Years	Maximum of 3 Years
03008.0	Human Resources	Benefit Plans Management	Benefits Administration	Annual Reports and Trust Documents: Permanent; Other Records: 15 Years	Maximum of 3 Years
03027.0	Human Resources	Benefits - Participants Records	Human Resources Service Center	Service History: Until Financial Obligations Cease + 6 Years; Elections and Designations: 6 Years After Outdated; Other Records: 6 Years	Maximum of 3 Years
03012.0	Human Resources	Compensation Planning Records	Compensation; Human Resources Manager	15 Years	Maximum of 3 Years

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03011.0	Human Resources	Compensation Plans	Compensation; Human Resources	Life of Plan + 10 Years	Maximum of 3 Years
03015.0	Human Resources	Disability and Leave Records	Human Resources Service Center	6 Years After Close of Case	Until Close of Case
03016.0	Human Resources	Drug Tests	Human Resources Manager	Positive Results: 5 Years; Negative Results: 1 Year	N/A
03017.0	Human Resources	Employee Issues Files	Human Resources Manager; Supervisor	6 Years After Resolution	Maximum of 3 Years
03019.0	Human Resources	Employment Eligibility Verification Forms (I-9)	Human Resources Manager	Life of Employment + 3 Years	N/A
03020.0	Human Resources	Grievances	Human Resources Manager	LONGER of: Employment + 6 Years or 6 Years After Settlement or Per Labor Contract Requirements	Maximum of 3 Years
03023.0	Human Resources	Job Descriptions	Human Resources; Compensation; Department Issuing Job Description	6 Years	Until Outdated or Superseded
03024.0	Human Resources	Labor Relations Strategy Records	Employee Relations	Until Outdated or Superseded	Maximum of 3 Years
03025.0	Human Resources	Labor Union Negotiation Files	Human Resources Manager	Permanent	Maximum of Life of Contract
03026.0	Human Resources	Management Development Program Records	Staffing & Development	2 Years	Maximum of 2 Years
03029.0	Human Resources	Payroll Deduction Authorizations	Human Resources Service Center	Until Outdated or Superseded + 15 Years	Maximum of 3 Years

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03030.0	Human Resources	Personnel Management	Human Resources Manager	Event, Achievement or Assessment Records: 5 Years; Hiring / Service History, Non-Vested: 6 Years after Termination; Hiring / Service History, Vested: 6 Years After Financial Obligations Cease	Maximum of 1 Year After Termination or Transfer
03920.0	Human Resources	Personnel Management - Desk Files	Department	Maximum of 1 Year After Termination or Transfer	N/A
03050.0	Human Resources	Personnel Management - Recruitment	Hiring Manager	6 Years	Maximum of 3 Years
03033.0	Human Resources	Recruitment Program Records	Human Resources Manager	6 Years	Maximum of 3 Years
03034.0	Human Resources	Regulatory Reporting - EEOC	EEO Compliance Office	Consolidated Reports: 4 Years; Local Records: 2 Years	Maximum of 3 Years
03035.0	Human Resources	Relocation Records	Human Resources Operations	15 Years After Transfer, Relocation or Assignment Completion	Maximum of 3 Years
03037.0	Human Resources	Tax Informational Reporting - Form 5500	Benefits Accounting	6 Years After Form 5500 Filing Date	Maximum of 3 Years
03038.0	Human Resources	Time Reporting Records	Human Resources Service Center; Entry Location	6 Years	Maximum of 3 Years
03938.0	Human Resources	Training Records - Non-Regulated	Office(s) Responsible for Development / Delivery and / or Attendance Tracking	Schedules & Attendance Records: Maximum of 2 Years; Training Materials: Until Obsolete or Superseded	Until Outdated or Superseded

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03040.0	Human Resources	Training Records - Regulated	Office(s) Responsible for Development / Delivery and / or Attendance Tracking	Schedules & Attendance Records: 6 Years; Employees' Records: Employment + 6 Years; Training Materials: 6 Years After Outdated	Maximum of 3 Years
03045.0 05001.0	Human Resources Information Technology	Union Employee Notices Access Security Records	Location Information Technology	Per Union Contract Until Deleted or Outdated + 3 Years	Maximum of 3 Years N/A
05003.0	Information Technology	Backup Media – Disaster Recovery Data	Information Technology	Backup Rotation Schedule	N/A
05006.0	Information Technology	Business Continuation Plan	Information Technology; Global Risk Management; Location or Department	Until Outdated or Superseded	N/A
05004.0	Information Technology	Computer System Program Documentation	System Administrator	Until Data is Migrated or Purged & Documentation is No Longer Relevant to Existing Data	Maximum of 3 Years
05009.0	Information Technology	Hardware Documentation	Information Technology	While Applicable to Processing Online or Off-line Data	Until Outdated or Superseded
05011.0	Information Technology	Help Desk	Information Technology	Until No Longer Referenced	N/A
05010.0	Information Technology	Information Technology Standards	Information Technology	Until Outdated	Until Outdated
05008.0	Information Technology	Internet Registration Records	Information Technology	Life of Registration + 6 Years	Maximum of Registration Life
05012.0	Information Technology	Program / System Software	Information Technology	While Applicable to Processing Online or Off-line	Until Outdated

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				Data	
05905.0	Information Technology	Project Management - Information Systems	Project Manager	Maximum of 5 Years After Project Completion	Maximum of 3 Years
05014.0	Information Technology	Software Management	Information Technology	Life of License + 6 Years	Maximum of License Life
05015.0	Information Technology	System Activity Monitoring Records	Information Technology	Maximum of 2 Years	N/A
05016.0	Information Technology	System Table Maintenance	Office Responsible for Table Maintenance	Accounting Systems' Chart of Accounts Tables: 15 Years; Other Systems: Maximum of 3 Years	Maximum of 3 Years
01039.0	Legal	Acquisitions and Sales - Real Property	Legal; IP Realty	Closing & Title Documents: Permanent; Other Ownership Records: Ownership + 10 Years; Abandoned Transactions: 2 Years After Abandonment	Maximum of 2 Years After Close
01001.0	Legal	Advice and Counsel	Legal	Maximum of 5 Years	Maximum of 3 Years
01058.0	Legal	Antitrust Oversight and Control	Legal	6 Years	Maximum of 3 Years
01005.0	Legal	Business and Product Development Legal Oversight	Legal	Maximum of 10 Years	Maximum of 3 Years
01009.0	Legal	Company Helpline Case Records	Ethics Office; Office Responsible for Investigation or Resolution	7 Years After Resolution	Maximum of Until Resolution
01008.0	Legal	Compliance Certifications	Office Controlling Certification Process	Until Outdated or Superseded + 6 Years	Maximum of 3 Years

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01017.0	Legal	Compliance Program Development and Maintenance	Office Responsible for Design, Implementation and / or Enforcement	Life of Program + 2 Years	Maximum of 3 Years
01055.0	Legal	Conflict of Interest Waivers	Legal	6 Years After Termination of Specific Representation	Maximum of 3 Years
01066.0	Legal	Contracts and Agreements	Office Controlling Contractual Relationship	Tax Agreements: Contract Obligations + 15 Years; All Others: Contract Obligations + 6 Years	Maximum of Life of Contract + 1 Year
01012.0	Legal	Contracts and Agreements - Improvements to Real Property	Office Managing the Property	Structural Improvements: Life of Property OR 20 Years after Project Completion; Non-Structural Improvements: 6 Years after Completion	Maximum of 3 Years After Improvement Completion
01067.0	Legal	Contracts and Agreements - Labor	Human Resources Manager	Permanent	Maximum of Life of Contract
01023.0	Legal	Foreign Trade Barrier Matters	Legal	Until Outdated + 3 Years	Maximum of 3 Years
01071.0	Legal	Fraud and Security Investigations	Office Conducting Investigation	5 Years After Investigation Close	Maximum of 3 Years
01024.0	Legal	Insurance Claims - Liability	Legal; Global Risk Management	10 Years After Settlement	Maximum of Until Settlement
01068.0	Legal	Insurance Claims - Loss / Damage	Global Supply Chain	10 Years After Settlement	Until Settlement
01061.0	Legal	Intellectual Property - Abandoned Trademark Applications	Legal	Abandonment of Application + 6 Years	Maximum of 3 Years

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01062.0	Legal	Intellectual Property - Common Law Trademarks	Legal	Date of Discontinued Use of the Trademark + 6 Years	Maximum of 3 Years
01027.0	Legal	Intellectual Property - Copyrights	Legal	Life of Copyright + 5 Years	Maximum of 3 Years
01063.0	Legal	Intellectual Property - Opinions	Legal	Life of Intellectual Property Matter + 6 Years	Maximum of 3 Years
01029.0	Legal	Intellectual Property - Patents	Legal	6 Years after Abandonment of a Patent Application, Lapse or Expiration of Last Foreign or U.S. Counterpart	Maximum of 3 Years
01030.0	Legal	Intellectual Property - Registered Trademarks	Legal	Life of Registration and / or Cancellation + 6 Years	Maximum of 3 Years
01064.0	Legal	Intellectual Property - Trademark Searches	Legal	Completion of Search + 6 Years	Maximum of 3 Years
01065.0	Legal	Intellectual Property - Unfiled Records of Inventions	Legal	System Disclosure Date + 10 Years	Maximum of 3 Years
01032.0	Legal	Legal Proceedings	Legal (Managing Attorney)	Litigation & Closed Claims: 10 Years After Resolution; Demand Letters and Claims Without Activity Since Incident Date: Maximum of 6 Years	Maximum of 3 Years After Settlement
01072.0	Legal	Legal Proceedings - Asbestos	Legal (Managing Attorney)	Permanent	Maximum of 3 Years After Settlement
01033.0	Legal	Legal Proceedings - Attachments and Garnishments	Legal; Human Resources Service Center	Duration of Attachment + 10 Years	Maximum of Life of Attachment

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01073.0	Legal	Legal Proceedings - Remediation	Legal (Managing Attorney)	Permanent	Maximum of 3 Years After Settlement
01070.0	Legal	Legal Proceedings - Service of Process	Legal	15 Years	Maximum of 3 Years
01059.0	Legal	Legal Proceedings - Third Party Subpoenas & Other Information Requests	Legal	Maximum of 3 Years	Maximum of 1 Year
01056.0	Legal	Licenses, Registrations and Certifications - FCC	Global Supply Chain	Duration of License	Until Renewal
01038.0	Legal	Political Action Committee Filings	Government Relations	Until Filed + 3 Years	Maximum of 3 Years
01040.0	Legal	Regulatory Audits, Inquiries and Exams	Legal	Non-Time Limited Regulatory Settlements, Obligations and / or Undertakings: Permanent; All Others: 10 Years After Completion	Maximum of 3 Years
01054.0	Legal	Regulatory Audits, Inquiries and Exams - Labor and Employment	Legal	3 Years After Completion	Maximum of 3 Years
01041.0	Legal	Regulatory Communications	Office Communicating with Regulator	Non-Time Limited Regulatory Settlements, Obligations and / or Undertakings: Permanent; All Others: 10 Years After Superseded	Maximum of 3 Years
01042.0	Legal	Regulatory Reporting	Office Responsible for Submission	10 Years	Maximum of 3 Years

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01069.0	Legal	Releases and Settlements	Legal	75 Years	Maximum of 3 Years
01057.0	Legal	Right-of-Way Records	Global Supply Chain	Life of Easement / Agreement + 6 Years	Maximum of Life of Easement / Agreement
01074.0	Legal	Vehicle Titles	Vehicle Location	Duration of Ownership	Maximum of Ownership Period
08103.0	Operations	Aircraft Operations and Maintenance	Aviation	Until Disposition of Aircraft	Maximum of 3 Years
08104.0	Operations	Bids and Proposals	Global Supply Chain; Office Responsible for Bid Process	3 Years	Maximum of 3 Years
08125.0	Operations	Bills of Lading	Shipping Location	15 Years	Maximum of 3 Years
08130.0	Operations	Building and Grounds Maintenance	Location	Maximum of 3 Years	Maximum of 1 Year
08113.0	Operations	Business Planning	Office Preparing the Plan	Maximum of 10 Years	Maximum of 3 Years
08105.0	Operations	Certificates of Insurance - Contractors	Office Controlling Contractual Relationship	When Filed with Associated Contract: Related Contract Retention Period; When Filed By Contractor: Life of Relationship with Contractor + 20 Years	Until Superseded
08106.0	Operations	Contract and Lease Management	Global Supply Chain; Office Managing Lease	Maximum of Life of Contract / Lease + 3 Years	Maximum of Life of Contract
08001.0	Operations	Crop Management	Location	Maximum of 10 Years After Harvest	Maximum of 3 Years
08107.0	Operations	Distribution Warehouse Management	Global Supply Chain	3 Years	Maximum of 3 Years

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08108.0	Operations	Driver Logs	Vehicle Location	3 Years	Maximum of 6 Months
08109.0	Operations	Driver Qualification Records	Vehicle Location	Duration of Employment + 3 Years	Maximum of 3 Years
08110.0	Operations	Driver's Inspection Records	Vehicle Location	3 Months	Maximum of 3 Months
08128.0	Operations	Equipment Maintenance	Location	Maintenance, Inspection and Repair Records: Life of Equipment + 10 Years; Analysis Reports and Logs: Maximum of 3 Years	Maximum of Life of Equipment + 3 Years
08003.0	Operations	Facility and Equipment Construction and Drawings	Project Manager	Structural Improvements: LONGER of: Life of Structure / Facility OR 20 Years after Project Completion; Non-Structural Improvements: 15 Years After Completion; Equipment: Life of Equipment + 10 Years	Maximum of 3 Years After Project Completion
08005.0	Operations	Facility Plan	Location	Until Outdated + 6 Years	Until Outdated
08126.0	Operations	Import / Export Control	Shipping and / or Receiving Location	5 Years	Maximum of 3 Years
08114.0	Operations	Inventory Reconciliation	Office Managing Inventory	Maximum of 5 Years	Maximum of 3 Years
08006.0	Operations	Lot Samples	Location Conducting Test	Maximum of 1 Year	N/A
08115.0	Operations	Materials and Supplies Management	Office Managing Materials and / or Supplies	15 Years	Maximum of 3 Years

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08008.0	Operations	Production and Productivity Data Management	Production Location	Maximum of 10 Years	Maximum of 3 Years
08127.0	Operations	Production Management	Production Location; Planner	Maximum of 3 Years	Maximum of 1 Year
08906.0	Operations	Project Management - Capital Projects	Project Manager	Approved: 15 Years After Project Completion; Non- Approved: Maximum of 7 Years After Final Decision	Maximum of 3 Years After Project Completion
08924.0	Operations	Project Management - Process Improvement Projects	Project Manager	Maximum of 5 Years After Project Completion	Maximum of 3 Years
08009.0	Operations	Quality Audits	Location Audited	7 Years	Maximum of 3 Years
08010.0	Operations	Quality Certification	Location	Life of Certification + 3 Years	Until Outdated
08011.0	Operations	Quality Control	Location Conducting Test	Maximum of 10 Years or as Required to Support Warranty Claims	Maximum of 1 Year
08129.0	Operations	Railroad Records	Operating Location	5 Years	Maximum of 3 Years
08012.0	Operations	Right of Entry Permits and Licenses	Office Issuing Permit	Until Expiration + 1 Year	Until Expiration
08120.0	Operations	Transportation Carriers Management	Office Managing Relationship	Maximum of Life of Relationship + 3 Years	Maximum of 3 Years
08121.0	Operations	Transportation Planning & Coordination	Global Supply Chain	Maximum of 3 Years	Maximum of 1 Year
08123.0	Operations	Vehicle Records	Vehicle Location	Registrations: Expiration + 3 Years; Other Records: 3	Maximum of 3 Years

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				Years	
04401.0	Sales & Marketing	Advertising	Marketing	3 Years After Last Use	Maximum of 3 Years
04403.0	Sales & Marketing	Competitive Intelligence	Marketing	Maximum of 10 Years	Maximum of 3 Years
04405.0	Sales & Marketing	Corporate Brand Management	Marketing	3 Years After Last Use	Maximum of 3 Years
04418.0	Sales & Marketing	Customer Account Management	Sales; Technology	Maximum of Life of Relationship + 1 Year	Maximum of Relationship Life
04404.0	Sales & Marketing	Customer Complaints	Office Resolving the Complaint	External Consumer Products Complaints: 4 Years After Resolution; All Other Complaints: 1 Year After Resolution; Complaint History Records: Maximum of 5 Years	Until Resolution
04407.0	Sales & Marketing	Market Research	Marketing	Until Outdated or Superseded + 3 Years	Maximum of 3 Years
04408.0	Sales & Marketing	Marketing Collateral	Marketing	3 Years After Last Use	Maximum of 3 Years
04411.0	Sales & Marketing	Pricing	Office Responsible for Setting Prices	5 Years	Maximum of 3 Years
04412.0	Sales & Marketing	Product Management	Marketing; Technology	Life of Product + 1 Year	Maximum of 3 Years
04413.0	Sales & Marketing	Prospect Management	Office Managing Leads	Until Outdated or Superseded	Maximum of 3 Years
04414.0	Sales & Marketing	Sales Account Management	Sales	Customers: Maximum of 6 Years After Last Use; Unsold Prospects: Maximum of 3 Years	Maximum of 3 Years
04415.0	Sales & Marketing	Sales Audits	Office Coordinating Audit	7 Years	Maximum of 3 Years

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04416.0	Sales & Marketing	Sales Data Management	Finance; Sales	Maximum of 10 Years	Maximum of 3 Years
04417.0	Sales & Marketing	Sales Orders	Sales	Orders: 15 Years; Other Records: Maximum of 2 Years	Maximum of 2 Years
04419.0	Sales & Marketing	Sales Promotions	Sales	Maximum of 3 Years	Maximum of 1 Year
07001.0	Technology	Conservation Management	Reporting Location	10 Years	Maximum of 3 Years
07003.0	Technology	Equipment Information	Location	Life of Equipment + 10 Years	Maximum of Life of Equipment
07005.0	Technology	Laboratory Notebooks	Technology	200 Years	Maximum of 3 Years
07007.0	Technology	Manufacturing Equipment and Process Standards	Technology	Maximum of Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
07006.0	Technology	Manufacturing Instructions	Technology	Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
07015.0	Technology	Manufacturing Materials Specifications	Technology	Maximum of Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
07010.0	Technology	Project Management - Technology Projects	Technology Project Manager	Approved: 15 Years After Project Completion; Non- Approved: Maximum of 7 Years After Final Decision	Maximum of Project Completion / Decision + 2 Years
07009.0	Technology	Technical Research Data	Technology Project Manager or Lead Researcher	200 Years	Maximum of 3 Years
07014.0	Technology	Testing	Technology	Maximum of 10 Years	Maximum of 3 Years

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00901.0	Administrative	Administrative Support	Department	Maximum of 3 Years	N/A
00950.0	Administrative	Buildings and Grounds Security	Location	Maximum of 3 Years	Maximum of 1 Year
00934.0	Administrative	Internal Operational / Management Reporting	Office Preparing Report	Maximum of 5 Years	Maximum of 3 Years
00919.0	Administrative	Meeting Management & Participation	Meeting Chair	Committees: Life of Committee + 3 Years; Non- Committees: Maximum of 3 Years	Maximum of 3 Years
00922.0	Administrative	Policies, Procedures, Guidelines and Processes	Office of Issuance	Compliance, EHS & HR Policies: 6 Years After Outdated or Superseded; All Others: Until Outdated or Superseded	Until Outdated
00933.0	Administrative	Policies, Procedures, Guidelines and Processes - Records Management	Legal	Legacy Retention Policies: 25 Years; Master Policies: 6 Years After Outdated or Superseded; Departmental Retention Schedules: 1 Year After Outdated or Superseded	Until Outdated or Superseded
00929.0	Administrative	Presentations and Speeches	Office Delivering the Presentation / Speech	Historically Significant: Permanent; All Others: Maximum of Last Use + 3 Years	Maximum of 3 Years
00926.0	Administrative	Records Storage & Destruction	Office Responsible for Records	On-Site Records: 10 Years After Destruction; Off-Site Records: 10 Years After Destruction of Box Contents	Maximum of 3 Years

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00927.0	Administrative	Reference Materials	Department	Until Superseded or Of No Value	N/A
00935.0	Administrative	Service Requests	Department Processing Request	Maximum of 3 Years	Maximum of 1 Year
00945.0	Administrative	Surveys	Office Conducting Survey	Maximum of 3 Years	Maximum of 1 Year
11006.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures	Corporate Secretary (Filings and Closing Documents); Office Responsible for Managing Due Diligence Process (Other Records)	Filings and Closing Documents: Permanent; Other Records, including Due Diligence: 2 Years After Transaction, Claims / Warranty Period Expiration or Abandonment of Transaction; Prospective Deals: Maximum of 10 Years After Last Consideration	Maximum of 2 Years After Transaction Completion
11117.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Transition Services	Office Managing Client Relationship	LONGER of: 15 Years or As Required by Contractual Agreement with Client	Maximum of 3 Years
11119.0	Corporate	Asset Management	Information Technology; Office Management	Maximum of 7 Years After Disposal of Equipment	Maximum of Equipment Life
11003.0	Corporate	Board and Committees Minute Books and Records	Corporate Secretary (IP and US Subsidiaries); Responsible Party (Non-US Subsidiaries)	Permanent	Maximum of Entity Life + 2 Years
11102.0	Corporate	Charitable Contributions	Office Approving Contribution	Approved and Tax Deductible: 15 Years; Denied or Non-Tax Deductible: Maximum of 3 Years	Maximum of 3 Years

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11103.0	Corporate	Communications - External	Office Issuing the Communication	Historically Significant: Permanent; All Others: Maximum of 10 Years	Maximum of 3 Years
11104.0	Corporate	Communications - Internal	Office Issuing the Communication	Maximum of 5 Years	Maximum of 3 Years
11105.0	Corporate	Company Performance Reporting	Investor Relations	6 Years	Maximum of 3 Years
11007.0	Corporate	Compensation Planning Records - Directors	Corporate Secretary	Until Financial Obligations Cease + 15 Years	Maximum of 3 Years
11019.0	Corporate	Corporate Organization and Ownership	Corporate Secretary	Permanent	Maximum of 3 Years
11021.0	Corporate	Delegation of Authority	Office Controlling the Delegation Authority	Until Obsolete or Superseded	Until Obsolete or Superseded
11022.0	Corporate	Directors and Officers - Selection and Retention	Corporate Secretary	Permanent	Maximum of 3 Years
11106.0	Corporate	Event Management	Office Managing the Event	Board-related Events: 10 Years; Other Events: Maximum of 5 Years After Event	Maximum of 3 Years
11107.0	Corporate	Executive Biographies	Communications	Duration of Employment + 10 Years	Maximum of Employment Duration
11108.0	Corporate	Foundation Management	Foundation	Life of the Foundation + 15 Years	Maximum of 3 Years
11120.0	Corporate	Governmental Lobbying / Influence Activities	Government Relations	Maximum of 6 Years	Maximum of 3 Years

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11109.0	Corporate	Image Management	Office Responsible for Controlling Image Access	Until Outdated or Superseded	Maximum of 3 Years
11110.0	Corporate	Industry Reporting	Office Submitting Report	Maximum of 10 Years	Maximum of 3 Years
11111.0	Corporate	Legislative Tracking	Government Relations	Perennial Issues: Until Outdated or Superseded; Other Records: Maximum of 6 Years	Maximum of 3 Years
11035.0	Corporate	Licenses, Registrations and Certifications	Corporate Secretary	Permanent	Maximum of 3 Years
11036.0	Corporate	Markets Listings	Corporate Secretary	Permanent	Maximum of 3 Years
11112.0	Corporate	Media Coverage	Communications	Maximum of 10 Years	Maximum of 3 Years
11113.0	Corporate	Political Action Committee Management	Government Relations	Fundraising Records: 15 Years; Other Records: Maximum of 6 Years	Maximum of 3 Years
11114.0	Corporate	Public Information Requests	Investor Relations	Request & Response: Maximum of 6 Years; Distribution Copies of Company Publications: Maximum of 10 Years	Maximum of 3 Years
11116.0	Corporate	Stockholder Records	Corporate Secretary	Permanent	Maximum of 3 Years
11051.0	Corporate	Stockholder Records - Shareholder Listings	Corporate Secretary	6 Years	Maximum of 3 Years
09150.0	Environment, Health & Safety	Citations and Notices of Violations (NOVs)	Location	3 Years After Resolution	Until Resolution
09005.0	Environment, Health & Safety	Emergency and Accident Prevention Planning	Location	Until Outdated or Superseded + 5 Years or Per Permit	Until Outdated or Superseded

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09270.0	Environment, Health & Safety	Environmental Credits	Corporate Environment, Health & Safety	15 Years	Maximum of 3 Years
09015.0	Environment, Health & Safety	Environmental Monitoring, Inspection and Testing	Location	Groundwater: Post Closure Care Period; PCBs: 7 Years or Last Disposal + 3 Years; All Others: 10 Years or Per Permit	Maximum of 3 Years
09025.0	Environment, Health & Safety	Environmental Permits	Location	Solid Waste: End of Post- Closure Care Period; All Other Permit Types: Until Superseded	Maximum of Permit Duration
09035.0	Environment, Health & Safety	Environmental Program Management	Corporate Environment, Health & Safety; Location	Until Outdated or Superseded	Maximum of 3 Years
09160.0	Environment, Health & Safety	Equipment Safety Inspections & Tests	Location	Fire Protection Equipment: Shorter of: Life of System / Equipment or Inspection / Test Cycle; Boilers & Pressure Vessels: Equipment Life; Radiographic Devices: 5 Years; Other Equipment: 2 Years	Maximum of 2 Years
09055.0	Environment, Health & Safety	Hazardous Materials Removal Project Management	Location	Project Completion + 30 Years	Maximum of 3 Years After Project Completion
09260.0	Environment, Health & Safety	Incident Tracking	Corporate Environment, Health & Safety; Location	Maximum of 10 Years	Maximum of 3 Years
09065.0	Environment, Health & Safety	Industrial Hygiene	Location	Noise Testing and Corrective Action Plans: 2 Years; All Other Records: 40 Years	Maximum of 3 Years

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09085.0	Environment, Health & Safety	Internal Audits and Assessments - Environment, Health & Safety	Location	Process Safety Management [PSM] Audits: Last 2 Audits; Other Audits: Until Corrective Action Plan [CAP] Developed; Current / Final CAP: Until Superseded or Certified	Until Outdated or Superseded
09090.0	Environment, Health & Safety	Licenses, Registrations, Accreditations and Certifications - EHS	Location	Expiration + 5 Years	Until Expiration
09045.0	Environment, Health & Safety	Material Safety Data Sheets (MSDS) and Hazardous Materials Communications	Location Using Hazardous Materials	Until Outdated + 30 Years	Until Outdated
09080.0	Environment, Health & Safety	Medical Records	Human Resources Manager; Health Services or Designee	Duration of Employment + 30 Years	Maximum of Duration of Employment
09110.0	Environment, Health & Safety	Occupational Injury and Illness	Location	6 Years	Maximum of 3 Years
09120.0	Environment, Health & Safety	Pest Control	Location	7 Years	Maximum of 3 Years
09140.0	Environment, Health & Safety	Regulatory Reporting - Environmental	Location	Landfills: Facility Closure + 3 Years; All Others: 10 Years	Maximum of 3 Years
09100.0	Environment, Health & Safety	Safety Committee Meetings	Safety Office; Meeting Location	3 Years	Maximum of 3 Years
09170.0	Environment, Health & Safety	Safety Permits	Location	1 Year	Maximum of 1 Year
09180.0	Environment, Health & Safety	Safety Program Management	Safety Office	Until Outdated or Superseded	Maximum of 3 Years

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09190.0	Environment, Health & Safety	Spills and Releases	Location	CERCLA / Superfund: Permanent; PCBs: Last Use + 3 Years; All Others: 10 Years	Maximum of 3 Years
09200.0	Environment, Health & Safety	Storage Tanks	Location	Life of Tank + 10 Years	Maximum of Tank Life
09210.0	Environment, Health & Safety	Toxic Substances Control	Location	5 Years	Maximum of 3 Years
09230.0	Environment, Health & Safety	Waste Facility Closures	Corporate Environment, Health & Safety; Location	Facility Closure Certification + Required Post-Closure Period	Until Outdated or Superseded
09240.0	Environment, Health & Safety	Waste Processing	Location	Hazardous Waste: LONGER of: Facility Closure or Duration of Ownership; Other Wastes: 5 Years	Maximum of 3 Years
09250.0	Environment, Health & Safety	Waste Shipment and Transportation	Location	Hazardous Waste: Permanent; Non-Hazardous or other Toxic Substances: 6 Years	Maximum of 3 Years
09075.0	Environment, Health & Safety	Workers Compensation Claims	Claims Administrator	Last Payment + 12 Years	Maximum of 3 Years After Last Payment
02004.0	Finance	Accounting Policies & Interpretations	Corporate Accounting; Financial Reporting	Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
02024.0	Finance	Accounting Records - Assets	Tax; Office Responsible for Asset Accounting	15 Years After Final Disposition of Asset / Obligation	Maximum of Asset / Obligation Life
02055.0	Finance	Accounting Records - General	Office Responsible for Processing or Reconciling	General Ledger: Permanent; All Other Records: 15 Years	Maximum of 3 Years

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			Transactions		
02012.0	Finance	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Financial Analysis	Corporate Accounting; Financial Reporting; Planning & Analysis; Office Responsible for Managing Due Diligence Process	Life of Ownership / Participation + 15 Years	Maximum of 3 Years After Transaction Completion
02008.0	Finance	Bank Relationship Files	Treasury	Contract Obligations + 15 Years	Maximum of Life of Relationship
02009.0	Finance	Bond Coverage Records	Global Risk Management	Contract Obligations + 6 Years	Maximum of Life of Bond
02010.0	Finance	Budget and Financial Planning	Budget & Analysis	5 Years	Maximum of 5 Years
02013.0	Finance	Corporate Credit Cards	Finance Operations; Service Provider	Termination / Expiration + 6 Years	Maximum of 3 Years
02015.0	Finance	Customer Credit Records	Credit; Controlling Office	Account Close + 15 Years	Maximum of 3 Years
02016.0	Finance	Debt Instruments	Treasury; Controlling Office	Life of Obligation + 15 Years	Maximum of Life of Obligation
02017.0	Finance	Debt Management	Treasury	15 Years	Maximum of 3 Years
02018.0	Finance	Derivatives and Other Treasury Transactions	Treasury; Financial Accounting	Termination / Expiration + 15 Years	Maximum of 3 Years
02019.0	Finance	External Financial Audits	Corporate Accounting; Financial Reporting; Office Audited	7 Years	Until Next Audit
02021.0	Finance	Financial Analysis	Corporate Accounting; Financial Reporting; Planning & Analysis; Local Accounting Office	Maximum of 10 Years	Maximum of 5 Years

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02020.0	Finance	Financial Guarantees	Treasury	Life of Obligation + 15 Years	Maximum of Life of Obligation
02022.0	Finance	Financial Statements	Corporate Accounting; Financial Reporting; Tax; Office Preparing Statement	Audited, Annual Consolidated Statements: Permanent; Quarterly Statements: 15 Years; Monthly Statements: Maximum of 5 Years	Maximum of 3 Years
02052.0	Finance	Imputed Income	Human Resources Service Center; Office Responsible for Calculation	15 Years	Maximum of 3 Years
02026.0	Finance	Insurance Policies	Global Risk Management; Office Securing Policy	Liability Policies: Permanent; Non-Liability Policies: 6 Years	Maximum of 3 Years
02027.0	Finance	Intellectual Property - Royalties	Legal	Life of Licensing Agreement + 15 Years	Maximum of 3 Years
02028.0	Finance	Internal Audits	Department Performing Audit	7 Years	Until Next Audit
02056.0	Finance	Internal Control Documentation	Department	7 Years	N/A
02030.0	Finance	Investment Management	Treasury	Life of Ownership + 15 Years	Maximum of 3 Years
02031.0	Finance	Investment Performance	Trust Investments	15 Years	Maximum of 3 Years
02049.0	Finance	Manufacturing Costs	Office Responsible for Cost Determination	Maximum of 15 Years	Maximum of 3 Years
02119.0	Finance	Purchase Orders	Office Responsible for Purchase Order Issuance	15 Years	Maximum of 3 Years

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02051.0	Finance	Regulatory Compliance - Financial Control Plans	Finance; Information Technology	Until Obsolete or Superseded + 15 Years	Maximum of 3 Years
02035.0	Finance	Regulatory Reporting - Financial Certifications	Legal	15 Years	Maximum of 3 Years
02115.0	Finance	Regulatory Reporting - SEC Filings	Corporate Secretary; Corporate Accounting; Financial Reporting	Published Versions: Permanent; Supporting Records: 15 Years	Maximum of 3 Years
02032.0	Finance	Risk Management Location Files	Global Risk Management	Until Outdated or Superseded	Maximum of 3 Years
02029.0	Finance	Standard Control Reports	Department	Annual, Semi-Annual & Quarterly Reports: 1 Year; Monthly Reports: 6 Months; Daily & Weekly Reports: 3 Months	N/A
02037.0	Finance	State Sales Tax Exemption Certificates	Tax; Controlling Office	Expiration + 15 Years	Maximum of 3 Years
02040.0	Finance	Tax Audit Files	Tax	15 Years After Settlement of Tax Audits	Maximum of 3 Years
02041.0	Finance	Tax Filings - Returns and Workpapers	Office Submitting Filing	Returns & Schedules, excluding Sales & Use and Excise Returns: Permanent; Other Records: 15 Years After Settlement of Tax Audits	Maximum of 3 Years
02042.0	Finance	Tax History Files	Tax	Permanent	Maximum of 3 Years
02043.0	Finance	Tax Identification Certification - W-9s	Finance Operations	15 Years	Maximum of 3 Years

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02044.0	Finance	Tax Informational Reporting	Finance Operations; Human Resources Service Center	15 Years	Maximum of 3 Years
02033.0	Finance	Tax Location Files	Tax	Until Outdated or Superseded	Maximum of 3 Years
02045.0	Finance	Tax Matters Files	Tax	Until Outdated or Superseded	Maximum of 3 Years
02046.0	Finance	Unclaimed Property Reports	Financial Reporting	15 Years	Maximum of 3 Years
03001.0	Human Resources	Affirmative Action Plans	EEO Compliance Office	Consolidated Plans and Reports: 4 Years; Local Records: Current Plan + 2 Prior Plans	Maximum of 3 Years
03004.0	Human Resources	Benefit Plans	Benefits Administration	Health and Welfare Plan Working Papers: Plan Obligations + 6 Years; All Other Records: Permanent	Maximum of Plan Obligations
03006.0	Human Resources	Benefit Plans Claims Administration	Benefits Administration	15 Years	Maximum of 3 Years
03008.0	Human Resources	Benefit Plans Management	Benefits Administration	Annual Reports and Trust Documents: Permanent; Other Records: 15 Years	Maximum of 3 Years
03027.0	Human Resources	Benefits - Participants Records	Human Resources Service Center	Service History: Until Financial Obligations Cease + 6 Years; Elections and Designations: 6 Years After Outdated; Other Records: 6 Years	Maximum of 3 Years
03012.0	Human Resources	Compensation Planning Records	Compensation; Human Resources Manager	15 Years	Maximum of 3 Years

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03011.0	Human Resources	Compensation Plans	Compensation; Human Resources	Life of Plan + 10 Years	Maximum of 3 Years
03015.0	Human Resources	Disability and Leave Records	Human Resources Service Center	6 Years After Close of Case	Until Close of Case
03016.0	Human Resources	Drug Tests	Human Resources Manager	Positive Results: 5 Years; Negative Results: 1 Year	N/A
03017.0	Human Resources	Employee Issues Files	Human Resources Manager; Supervisor	6 Years After Resolution	Maximum of 3 Years
03019.0	Human Resources	Employment Eligibility Verification Forms (I-9)	Human Resources Manager	Life of Employment + 3 Years	N/A
03020.0	Human Resources	Grievances	Human Resources Manager	LONGER of: Employment + 6 Years or 6 Years After Settlement or Per Labor Contract Requirements	Maximum of 3 Years
03023.0	Human Resources	Job Descriptions	Human Resources; Compensation; Department Issuing Job Description	6 Years	Until Outdated or Superseded
03024.0	Human Resources	Labor Relations Strategy Records	Employee Relations	Until Outdated or Superseded	Maximum of 3 Years
03025.0	Human Resources	Labor Union Negotiation Files	Human Resources Manager	Permanent	Maximum of Life of Contract
03026.0	Human Resources	Management Development Program Records	Staffing & Development	2 Years	Maximum of 2 Years
03029.0	Human Resources	Payroll Deduction Authorizations	Human Resources Service Center	Until Outdated or Superseded + 15 Years	Maximum of 3 Years

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03030.0	Human Resources	Personnel Management	Human Resources Manager	Event, Achievement or Assessment Records: 5 Years; Hiring / Service History, Non-Vested: 6 Years after Termination; Hiring / Service History, Vested: 6 Years After Financial Obligations Cease	Maximum of 1 Year After Termination or Transfer
03920.0	Human Resources	Personnel Management - Desk Files	Department	Maximum of 1 Year After Termination or Transfer	N/A
03050.0	Human Resources	Personnel Management - Recruitment	Hiring Manager	6 Years	Maximum of 3 Years
03033.0	Human Resources	Recruitment Program Records	Human Resources Manager	6 Years	Maximum of 3 Years
03034.0	Human Resources	Regulatory Reporting - EEOC	EEO Compliance Office	Consolidated Reports: 4 Years; Local Records: 2 Years	Maximum of 3 Years
03035.0	Human Resources	Relocation Records	Human Resources Operations	15 Years After Transfer, Relocation or Assignment Completion	Maximum of 3 Years
03037.0	Human Resources	Tax Informational Reporting - Form 5500	Benefits Accounting	6 Years After Form 5500 Filing Date	Maximum of 3 Years
03038.0	Human Resources	Time Reporting Records	Human Resources Service Center; Entry Location	6 Years	Maximum of 3 Years
03938.0	Human Resources	Training Records - Non-Regulated	Office(s) Responsible for Development / Delivery and / or Attendance Tracking	Schedules & Attendance Records: Maximum of 2 Years; Training Materials: Until Obsolete or Superseded	Until Outdated or Superseded
03040.0	Human Resources	Training Records - Regulated	Office(s) Responsible for Development / Delivery and	Schedules & Attendance Records: 6 Years; Employees'	Maximum of 3 Years

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			/ or Attendance Tracking	Records: Employment + 6 Years; Training Materials: 6 Years After Outdated Per Union Contract	Maximum of 3 Years
03045.0	Human Resources	Union Employee Notices	Location		
05001.0	Information Technology	Access Security Records	Information Technology	Until Deleted or Outdated + 3 Years	N/A
05003.0	Information Technology	Backup Media – Disaster Recovery Data	Information Technology	Backup Rotation Schedule	N/A
05006.0	Information Technology	Business Continuation Plan	Information Technology; Global Risk Management; Location or Department	Until Outdated or Superseded	N/A
05004.0	Information Technology	Computer System Program Documentation	System Administrator	Until Data is Migrated or Purged & Documentation is No Longer Relevant to Existing Data	Maximum of 3 Years
05009.0	Information Technology	Hardware Documentation	Information Technology	While Applicable to Processing Online or Off-line Data	Until Outdated or Superseded
05011.0	Information Technology	Help Desk	Information Technology	Until No Longer Referenced	N/A
05010.0	Information Technology	Information Technology Standards	Information Technology	Until Outdated	Until Outdated
05008.0	Information Technology	Internet Registration Records	Information Technology	Life of Registration + 6 Years	Maximum of Registration Life
05012.0	Information Technology	Program / System Software	Information Technology	While Applicable to Processing Online or Off-line Data	Until Outdated

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05905.0	Information Technology	Project Management - Information Systems	Project Manager	Maximum of 5 Years After Project Completion	Maximum of 3 Years
05014.0	Information Technology	Software Management	Information Technology	Life of License + 6 Years	Maximum of License Life
05015.0	Information Technology	System Activity Monitoring Records	Information Technology	Maximum of 2 Years	N/A
05016.0	Information Technology	System Table Maintenance	Office Responsible for Table Maintenance	Accounting Systems' Chart of Accounts Tables: 15 Years; Other Systems: Maximum of 3 Years	Maximum of 3 Years
01039.0	Legal	Acquisitions and Sales - Real Property	Legal; IP Realty	Closing & Title Documents: Permanent; Other Ownership Records: Ownership + 10 Years; Abandoned Transactions: 2 Years After Abandonment	Maximum of 2 Years After Close
01001.0	Legal	Advice and Counsel	Legal	Maximum of 5 Years	Maximum of 3 Years
01058.0	Legal	Antitrust Oversight and Control	Legal	6 Years	Maximum of 3 Years
01005.0	Legal	Business and Product Development Legal Oversight	Legal	Maximum of 10 Years	Maximum of 3 Years
01009.0	Legal	Company Helpline Case Records	Ethics Office; Office Responsible for Investigation or Resolution	7 Years After Resolution	Maximum of Until Resolution
01008.0	Legal	Compliance Certifications	Office Controlling Certification Process	Until Outdated or Superseded + 6 Years	Maximum of 3 Years

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01017.0	Legal	Compliance Program Development and Maintenance	Office Responsible for Design, Implementation and / or Enforcement	Life of Program + 2 Years	Maximum of 3 Years
01055.0	Legal	Conflict of Interest Waivers	Legal	6 Years After Termination of Specific Representation	Maximum of 3 Years
01066.0	Legal	Contracts and Agreements	Office Controlling Contractual Relationship	Tax Agreements: Contract Obligations + 15 Years; All Others: Contract Obligations + 6 Years	Maximum of Life of Contract + 1 Year
01012.0	Legal	Contracts and Agreements - Improvements to Real Property	Office Managing the Property	Structural Improvements: Life of Property OR 20 Years after Project Completion; Non-Structural Improvements: 6 Years after Completion	Maximum of 3 Years After Improvement Completion
01067.0	Legal	Contracts and Agreements - Labor	Human Resources Manager	Permanent	Maximum of Life of Contract
01023.0	Legal	Foreign Trade Barrier Matters	Legal	Until Outdated + 3 Years	Maximum of 3 Years
01071.0	Legal	Fraud and Security Investigations	Office Conducting Investigation	5 Years After Investigation Close	Maximum of 3 Years
01024.0	Legal	Insurance Claims - Liability	Legal; Global Risk Management	10 Years After Settlement	Maximum of Until Settlement
01068.0	Legal	Insurance Claims - Loss / Damage	Global Supply Chain	10 Years After Settlement	Until Settlement
01061.0	Legal	Intellectual Property - Abandoned Trademark Applications	Legal	Abandonment of Application + 6 Years	Maximum of 3 Years

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01062.0	Legal	Intellectual Property - Common Law Trademarks	Legal	Date of Discontinued Use of the Trademark + 6 Years	Maximum of 3 Years
01027.0	Legal	Intellectual Property - Copyrights	Legal	Life of Copyright + 5 Years	Maximum of 3 Years
01063.0	Legal	Intellectual Property - Opinions	Legal	Life of Intellectual Property Matter + 6 Years	Maximum of 3 Years
01029.0	Legal	Intellectual Property - Patents	Legal	6 Years after Abandonment of a Patent Application, Lapse or Expiration of Last Foreign or U.S. Counterpart	Maximum of 3 Years
01030.0	Legal	Intellectual Property - Registered Trademarks	Legal	Life of Registration and / or Cancellation + 6 Years	Maximum of 3 Years
01064.0	Legal	Intellectual Property - Trademark Searches	Legal	Completion of Search + 6 Years	Maximum of 3 Years
01065.0	Legal	Intellectual Property - Unfiled Records of Inventions	Legal	System Disclosure Date + 10 Years	Maximum of 3 Years
01032.0	Legal	Legal Proceedings	Legal (Managing Attorney)	Litigation & Closed Claims: 10 Years After Resolution; Demand Letters and Claims Without Activity Since Incident Date: Maximum of 6 Years	Maximum of 3 Years After Settlement
01072.0	Legal	Legal Proceedings - Asbestos	Legal (Managing Attorney)	Permanent	Maximum of 3 Years After Settlement
01033.0	Legal	Legal Proceedings - Attachments and	Legal; Human Resources Service Center	Duration of Attachment + 10 Years	Maximum of Life of Attachment

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		Garnishments			
01073.0	Legal	Legal Proceedings - Remediation	Legal (Managing Attorney)	Permanent	Maximum of 3 Years After Settlement
01070.0	Legal	Legal Proceedings - Service of Process	Legal	15 Years	Maximum of 3 Years
01059.0	Legal	Legal Proceedings - Third Party Subpoenas & Other Information Requests	Legal	Maximum of 3 Years	Maximum of 1 Year
01056.0	Legal	Licenses, Registrations and Certifications - FCC	Global Supply Chain	Duration of License	Until Renewal
01038.0	Legal	Political Action Committee Filings	Government Relations	Until Filed + 3 Years	Maximum of 3 Years
01075.0	Legal	Product Liability Warranty Claims	Legal	Masonite Claims: Warranty Period or Maximum of 18 Years After Settlement; Other Claims: 10 Years After Settlement or Release	Masonite Claims: Maximum of 3 Years After Settlement; Other Claims: Maximum of Until Settlement
01040.0	Legal	Regulatory Audits, Inquiries and Exams	Legal	Non-Time Limited Regulatory Settlements, Obligations and / or Undertakings: Permanent; All Others: 10 Years After Completion	Maximum of 3 Years
01054.0	Legal	Regulatory Audits, Inquiries and Exams - Labor and Employment	Legal	3 Years After Completion	Maximum of 3 Years
01041.0	Legal	Regulatory Communications	Office Communicating with Regulator	Non-Time Limited Regulatory Settlements, Obligations and /	Maximum of 3 Years

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				or Undertakings: Permanent; All Others: 10 Years After Superseded	
01042.0	Legal	Regulatory Reporting	Office Responsible for Submission	10 Years	Maximum of 3 Years
01069.0	Legal	Releases and Settlements	Legal	75 Years	Maximum of 3 Years
01057.0	Legal	Right-of-Way Records	Global Supply Chain	Life of Easement / Agreement + 6 Years	Maximum of Life of Easement / Agreement
01074.0	Legal	Vehicle Titles	Vehicle Location	Duration of Ownership	Maximum of Ownership Period
08103.0	Operations	Aircraft Operations and Maintenance	Aviation	Until Disposition of Aircraft	Maximum of 3 Years
08104.0	Operations	Bids and Proposals	Global Supply Chain; Office Responsible for Bid Process	3 Years	Maximum of 3 Years
08125.0	Operations	Bills of Lading	Shipping Location	15 Years	Maximum of 3 Years
08130.0	Operations	Building and Grounds Maintenance	Location	Maximum of 3 Years	Maximum of 1 Year
08113.0	Operations	Business Planning	Office Preparing the Plan	Maximum of 10 Years	Maximum of 3 Years
08105.0	Operations	Certificates of Insurance - Contractors	Office Controlling Contractual Relationship	When Filed with Associated Contract: Related Contract Retention Period; When Filed By Contractor: Life of Relationship with Contractor + 20 Years	Until Superseded
08106.0	Operations	Contract and Lease Management	Global Supply Chain; Office Managing Lease	Maximum of Life of Contract / Lease + 3 Years	Maximum of Life of Contract

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08001.0	Operations	Crop Management	Location	Maximum of 10 Years After Harvest	Maximum of 3 Years
08107.0	Operations	Distribution Warehouse Management	Global Supply Chain	3 Years	Maximum of 3 Years
08108.0	Operations	Driver Logs	Vehicle Location	3 Years	Maximum of 6 Months
08109.0	Operations	Driver Qualification Records	Vehicle Location	Duration of Employment + 3 Years	Maximum of 3 Years
08110.0	Operations	Driver's Inspection Records	Vehicle Location	3 Months	Maximum of 3 Months
08128.0	Operations	Equipment Maintenance	Location	Maintenance, Inspection and Repair Records: Life of Equipment + 10 Years; Analysis Reports and Logs: Maximum of 3 Years	Maximum of Life of Equipment + 3 Years
08003.0	Operations	Facility and Equipment Construction and Drawings	Project Manager	Structural Improvements: LONGER of: Life of Structure / Facility OR 20 Years after Project Completion; Non-Structural Improvements: 15 Years After Completion; Equipment: Life of Equipment + 10 Years	Maximum of 3 Years After Project Completion
08005.0	Operations	Facility Plan	Location	Until Outdated + 6 Years	Until Outdated
08126.0	Operations	Import / Export Control	Shipping and / or Receiving Location	5 Years	Maximum of 3 Years
08114.0	Operations	Inventory Reconciliation	Office Managing Inventory	Maximum of 5 Years	Maximum of 3 Years
08006.0	Operations	Lot Samples	Location Conducting Test	Maximum of 1 Year	N/A

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08115.0	Operations	Materials and Supplies Management	Office Managing Materials and / or Supplies	15 Years	Maximum of 3 Years
08008.0	Operations	Production and Productivity Data Management	Production Location	Maximum of 10 Years	Maximum of 3 Years
08127.0	Operations	Production Management	Production Location; Planner	Maximum of 3 Years	Maximum of 1 Year
08906.0	Operations	Project Management - Capital Projects	Project Manager	Approved: 15 Years After Project Completion; Non-Approved: Maximum of 7 Years After Final Decision	Maximum of 3 Years After Project Completion
08924.0	Operations	Project Management - Process Improvement Projects	Project Manager	Maximum of 5 Years After Project Completion	Maximum of 3 Years
08009.0	Operations	Quality Audits	Location Audited	7 Years	Maximum of 3 Years
08010.0	Operations	Quality Certification	Location	Life of Certification + 3 Years	Until Outdated
08011.0	Operations	Quality Control	Location Conducting Test	Maximum of 10 Years or as Required to Support Warranty Claims	Maximum of 1 Year
08129.0	Operations	Railroad Records	Operating Location	5 Years	Maximum of 3 Years
08012.0	Operations	Right of Entry Permits and Licenses	Office Issuing Permit	Until Expiration + 1 Year	Until Expiration
08120.0	Operations	Transportation Carriers Management	Office Managing Relationship	Maximum of Life of Relationship + 3 Years	Maximum of 3 Years
08121.0	Operations	Transportation Planning & Coordination	Global Supply Chain	Maximum of 3 Years	Maximum of 1 Year

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08123.0	Operations	Vehicle Records	Vehicle Location	Registrations: Expiration + 3 Years; Other Records: 3 Years	Maximum of 3 Years
04401.0	Sales & Marketing	Advertising	Marketing	3 Years After Last Use	Maximum of 3 Years
04403.0	Sales & Marketing	Competitive Intelligence	Marketing	Maximum of 10 Years	Maximum of 3 Years
04405.0	Sales & Marketing	Corporate Brand Management	Marketing	3 Years After Last Use	Maximum of 3 Years
04418.0	Sales & Marketing	Customer Account Management	Sales; Technology	Maximum of Life of Relationship + 1 Year	Maximum of Relationship Life
04404.0	Sales & Marketing	Customer Complaints	Office Resolving the Complaint	External Consumer Products Complaints: 4 Years After Resolution; All Other Complaints: 1 Year After Resolution; Complaint History Records: Maximum of 5 Years	Until Resolution
04407.0	Sales & Marketing	Market Research	Marketing	Until Outdated or Superseded + 3 Years	Maximum of 3 Years
04408.0	Sales & Marketing	Marketing Collateral	Marketing	3 Years After Last Use	Maximum of 3 Years
04411.0	Sales & Marketing	Pricing	Office Responsible for Setting Prices	5 Years	Maximum of 3 Years
04412.0	Sales & Marketing	Product Management	Marketing; Technology	Life of Product + 1 Year	Maximum of 3 Years
04413.0	Sales & Marketing	Prospect Management	Office Managing Leads	Until Outdated or Superseded	Maximum of 3 Years
04414.0	Sales & Marketing	Sales Account Management	Sales	Customers: Maximum of 6 Years After Last Use; Unsold Prospects: Maximum of 3 Years	Maximum of 3 Years

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04415.0	Sales & Marketing	Sales Audits	Office Coordinating Audit	7 Years	Maximum of 3 Years
04416.0	Sales & Marketing	Sales Data Management	Finance; Sales	Maximum of 10 Years	Maximum of 3 Years
04417.0	Sales & Marketing	Sales Orders	Sales	Orders: 15 Years; Other Records: Maximum of 2 Years	Maximum of 2 Years
04419.0	Sales & Marketing	Sales Promotions	Sales	Maximum of 3 Years	Maximum of 1 Year
07001.0	Technology	Conservation Management	Reporting Location	10 Years	Maximum of 3 Years
07003.0	Technology	Equipment Information	Location	Life of Equipment + 10 Years	Maximum of Life of Equipment
07005.0	Technology	Laboratory Notebooks	Technology	200 Years	Maximum of 3 Years
07007.0	Technology	Manufacturing Equipment and Process Standards	Technology	Maximum of Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
07006.0	Technology	Manufacturing Instructions	Technology	Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
07015.0	Technology	Manufacturing Materials Specifications	Technology	Maximum of Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
07010.0	Technology	Project Management - Technology Projects	Technology Project Manager	Approved: 15 Years After Project Completion; Non- Approved: Maximum of 7 Years After Final Decision	Maximum of Project Completion / Decision + 2 Years
07009.0	Technology	Technical Research Data	Technology Project Manager or Lead Researcher	200 Years	Maximum of 3 Years
07014.0	Technology	Testing	Technology	Maximum of 10 Years	Maximum of 3 Years

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00901.0	Administrative	Administrative Support	Department	Maximum of 3 Years	N/A
00950.0	Administrative	Buildings and Grounds Security	Location	Maximum of 3 Years	Maximum of 1 Year
00934.0	Administrative	Internal Operational / Management Reporting	Office Preparing Report	Maximum of 5 Years	Maximum of 3 Years
00919.0	Administrative	Meeting Management & Participation	Meeting Chair	Committees: Life of Committee + 3 Years; Non-Committees: Maximum of 3 Years	Maximum of 3 Years
00922.0	Administrative	Policies, Procedures, Guidelines and Processes	Office of Issuance	Compliance, EHS & HR Policies: 6 Years After Outdated or Superseded; All Others: Until Outdated or Superseded	Until Outdated
00933.0	Administrative	Policies, Procedures, Guidelines and Processes - Records Management	Legal	Legacy Retention Policies: 25 Years; Master Policies: 6 Years After Outdated or Superseded; Departmental Retention Schedules: 1 Year After Outdated or Superseded	Until Outdated or Superseded
00929.0	Administrative	Presentations and Speeches	Office Delivering the Presentation / Speech	Historically Significant: Permanent; All Others: Maximum of Last Use + 3 Years	Maximum of 3 Years
00926.0	Administrative	Records Storage & Destruction	Office Responsible for Records	On-Site Records: 10 Years After Destruction; Off-Site Records: 10 Years After Destruction of Box Contents	Maximum of 3 Years
00927.0	Administrative	Reference Materials	Department	Until Superseded or Of No Value	N/A
00935.0	Administrative	Service Requests	Department Processing Request	Maximum of 3 Years	Maximum of 1 Year
00945.0	Administrative	Surveys	Office Conducting Survey	Maximum of 3 Years	Maximum of 1 Year
99993.0	Administrative	Test Policy Seven	Department	Maximum of 1 Year	N/A
99997.0	Administrative	ZTest Policy Three - 02	Department	Until Superseded / Outdated	REV 02
11006.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures	Corporate Secretary (Filings and Closing Documents); Office Responsible for Managing Due Diligence Process (Other Records)	Filings and Closing Documents: Permanent; Other Records, including Due Diligence: 2 Years After Transaction, Claims / Warranty Period Expiration or Abandonment of Transaction; Prospective Deals: Maximum of 10 Years After Last Consideration	Maximum of 2 Years After Transaction Completion
11117.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Transition Services	Office Managing Client Relationship	LONGER of: 15 Years or As Required by Contractual Agreement with Client	Maximum of 3 Years

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11119.0	Corporate	Asset Management	Information Technology; Office Management	Maximum of 7 Years After Disposal of Equipment	Maximum of Equipment Life
11003.0	Corporate	Board and Committees Minute Books and Records	Corporate Secretary (IP and US Subsidiaries); Responsible Party (Non-US Subsidiaries)	Permanent	Maximum of Entity Life + 2 Years
11102.0	Corporate	Charitable Contributions	Office Approving Contribution	Approved and Tax Deductible: 15 Years; Denied or Non-Tax Deductible: Maximum of 3 Years	Maximum of 3 Years
11103.0	Corporate	Communications - External	Office Issuing the Communication	Historically Significant: Permanent; All Others: Maximum of 10 Years	Maximum of 3 Years
11104.0	Corporate	Communications - Internal	Office Issuing the Communication	Maximum of 5 Years	Maximum of 3 Years
11105.0	Corporate	Company Performance Reporting	Investor Relations	6 Years	Maximum of 3 Years
11007.0	Corporate	Compensation Planning Records - Directors	Corporate Secretary	Until Financial Obligations Cease + 15 Years	Maximum of 3 Years
11019.0	Corporate	Corporate Organization and Ownership	Corporate Secretary	Permanent	Maximum of 3 Years
11021.0	Corporate	Delegation of Authority	Office Controlling the Delegation Authority	Until Obsolete or Superseded	Until Obsolete or Superseded
11022.0	Corporate	Directors and Officers - Selection and Retention	Corporate Secretary	Permanent	Maximum of 3 Years
11106.0	Corporate	Event Management	Office Managing the Event	Board-related Events: 10 Years; Other Events: Maximum of 5 Years After Event	Maximum of 3 Years
11107.0	Corporate	Executive Biographies	Communications	Duration of Employment + 10 Years	Maximum of Employment Duration
11108.0	Corporate	Foundation Management	Foundation	Life of the Foundation + 15 Years	Maximum of 3 Years
11120.0	Corporate	Governmental Lobbying / Influence Activities	Government Relations	Maximum of 6 Years	Maximum of 3 Years
11109.0	Corporate	Image Management	Office Responsible for Controlling Image Access	Until Outdated or Superseded	Maximum of 3 Years
11110.0	Corporate	Industry Reporting	Office Submitting Report	Maximum of 10 Years	Maximum of 3 Years
11111.0	Corporate	Legislative Tracking	Government Relations	Perennial Issues: Until Outdated or Superseded; Other Records: Maximum of 6 Years	Maximum of 3 Years

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11035.0	Corporate	Licenses, Registrations and Certifications	Corporate Secretary	Registered Process Agents Records: 10 Years; Other Records: Permanent	Maximum of 3 Years
11036.0	Corporate	Markets Listings	Corporate Secretary	Permanent	Maximum of 3 Years
11112.0	Corporate	Media Coverage	Communications	Maximum of 10 Years	Maximum of 3 Years
11113.0	Corporate	Political Action Committee Management	Government Relations	Fundraising Records: 15 Years; Other Records: Maximum of 6 Years	Maximum of 3 Years
11114.0	Corporate	Public Information Requests	Investor Relations	Request & Response: Maximum of 6 Years; Distribution Copies of Company Publications: Maximum of 10 Years	Maximum of 3 Years
11116.0	Corporate	Stockholder Records	Corporate Secretary	Permanent	Maximum of 3 Years
11051.0	Corporate	Stockholder Records - Shareholder Listings	Corporate Secretary	6 Years	Maximum of 3 Years
09150.0	Environment, Health & Safety	Citations and Notices of Violations (NOVs)	Location	3 Years After Resolution	Until Resolution
09005.0	Environment, Health & Safety	Emergency and Accident Prevention Planning	Location	Until Outdated or Superseded + 5 Years or Per Permit	Until Outdated or Superseded
09270.0	Environment, Health & Safety	Environmental Credits	Corporate Environment, Health & Safety	15 Years	Maximum of 3 Years
09015.0	Environment, Health & Safety	Environmental Monitoring, Inspection and Testing	Location	Groundwater: Post Closure Care Period; PCBs: 7 Years or Last Disposal + 3 Years; All Others: 10 Years or Per Permit	Maximum of 3 Years
09025.0	Environment, Health & Safety	Environmental Permits	Location	Solid Waste: End of Post-Closure Care Period; All Other Permit Types: Until Superseded	Maximum of Permit Duration
09035.0	Environment, Health & Safety	Environmental Program Management	Corporate Environment, Health & Safety; Location	Until Outdated or Superseded	Maximum of 3 Years
09160.0	Environment, Health & Safety	Equipment Safety Inspections & Tests	Location	Fire Protection Equipment: Shorter of: Life of System / Equipment or Inspection / Test Cycle; Boilers & Pressure Vessels: Equipment Life; Radiographic Devices: 5 Years; Other Equipment: 2 Years	Maximum of 2 Years
09055.0	Environment, Health & Safety	Hazardous Materials Removal Project Management	Location	Project Completion + 30 Years	Maximum of 3 Years After Project Completion
09260.0	Environment, Health	Incident Tracking	Corporate Environment, Health &	Maximum of 10 Years	Maximum of 3 Years

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	& Safety		Safety; Location		
09065.0	Environment, Health & Safety	Industrial Hygiene	Location	Noise Testing and Corrective Action Plans: 2 Years; All Other Records: 40 Years	Maximum of 3 Years
09085.0	Environment, Health & Safety	Internal Audits and Assessments - Environment, Health & Safety	Location	Process Safety Management [PSM] Audits: Last 2 Audits; Other Audits: Until Corrective Action Plan [CAP] Developed; Current / Final CAP: Until Superseded or Certified	Until Outdated or Superseded
09090.0	Environment, Health & Safety	Licenses, Registrations, Accreditations and Certifications - EHS	Location	Expiration + 5 Years	Until Expiration
09045.0	Environment, Health & Safety	Material Safety Data Sheets (MSDS) and Hazardous Materials Communications	Location Using Hazardous Materials	Until Outdated + 30 Years	Until Outdated
09080.0	Environment, Health & Safety	Medical Records	Human Resources Manager; Health Services or Designee	Duration of Employment + 30 Years	Maximum of Duration of Employment
09110.0	Environment, Health & Safety	Occupational Injury and Illness	Location	6 Years	Maximum of 3 Years
09120.0	Environment, Health & Safety	Pest Control	Location	7 Years	Maximum of 3 Years
09140.0	Environment, Health & Safety	Regulatory Reporting - Environmental	Location	Landfills: Facility Closure + 3 Years; All Others: 10 Years	Maximum of 3 Years
09100.0	Environment, Health & Safety	Safety Committee Meetings	Safety Office; Meeting Location	3 Years	Maximum of 3 Years
09170.0	Environment, Health & Safety	Safety Permits	Location	1 Year	Maximum of 1 Year
09180.0	Environment, Health & Safety	Safety Program Management	Safety Office	Until Outdated or Superseded	Maximum of 3 Years
09190.0	Environment, Health & Safety	Spills and Releases	Location	CERCLA / Superfund: Permanent; PCBs: Last Use + 3 Years; All Others: 10 Years	Maximum of 3 Years
09200.0	Environment, Health & Safety	Storage Tanks	Location	Life of Tank + 10 Years	Maximum of Tank Life
09210.0	Environment, Health & Safety	Toxic Substances Control	Location	5 Years	Maximum of 3 Years

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09230.0	Environment, Health & Safety	Waste Facility Closures	Corporate Environment, Health & Safety; Location	Facility Closure Certification + Required Post-Closure Period	Until Outdated or Superseded
09240.0	Environment, Health & Safety	Waste Processing	Location	Hazardous Waste: LONGER of: Facility Closure or Duration of Ownership; Other Wastes: 5 Years	Maximum of 3 Years
09250.0	Environment, Health & Safety	Waste Shipment and Transportation	Location	Hazardous Waste: Permanent; Non-Hazardous or other Toxic Substances: 6 Years	Maximum of 3 Years
09075.0	Environment, Health & Safety	Workers Compensation Claims	Claims Administrator	Last Payment + 12 Years	Maximum of 3 Years After Last Payment
02004.0	Finance	Accounting Policies & Interpretations	Corporate Accounting; Financial Reporting	Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
02024.0	Finance	Accounting Records - Assets	Tax; Office Responsible for Asset Accounting	15 Years After Final Disposition of Asset / Obligation	Maximum of Asset / Obligation Life
02055.0	Finance	Accounting Records - General	Office Responsible for Processing or Reconciling Transactions	General Ledger: Permanent; All Other Records: 15 Years	Maximum of 3 Years
02012.0	Finance	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Financial Analysis	Corporate Accounting; Financial Reporting; Planning & Analysis; Office Responsible for Managing Due Diligence Process	Life of Ownership / Participation + 15 Years	Maximum of 3 Years After Transaction Completion
02008.0	Finance	Bank Relationship Files	Treasury	Contract Obligations + 15 Years	Maximum of Life of Relationship
02009.0	Finance	Bond Coverage Records	Global Risk Management	Contract Obligations + 6 Years	Maximum of Life of Bond
02010.0	Finance	Budget and Financial Planning	Budget & Analysis	5 Years	Maximum of 5 Years
02013.0	Finance	Corporate Credit Cards	Finance Operations; Service Provider	Termination / Expiration + 6 Years	Maximum of 3 Years
02015.0	Finance	Customer Credit Records	Credit; Controlling Office	Account Close + 15 Years	Maximum of 3 Years
02016.0	Finance	Debt Instruments	Treasury; Controlling Office	Life of Obligation + 15 Years	Maximum of Life of Obligation
02017.0	Finance	Debt Management	Treasury	15 Years	Maximum of 3 Years
02018.0	Finance	Derivatives and Other Treasury Transactions	Treasury; Financial Accounting	Termination / Expiration + 15 Years	Maximum of 3 Years
02019.0	Finance	External Financial Audits	Corporate Accounting; Financial	7 Years	Until Next Audit

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			Reporting; Office Audited		
02021.0	Finance	Financial Analysis	Corporate Accounting; Financial Reporting; Planning & Analysis; Local Accounting Office	Maximum of 10 Years	Maximum of 5 Years
02020.0	Finance	Financial Guarantees	Treasury	Life of Obligation + 15 Years	Maximum of Life of Obligation
02022.0	Finance	Financial Statements	Corporate Accounting; Financial Reporting; Tax; Office Preparing Statement	Audited, Annual Consolidated Statements: Permanent; Quarterly Statements: 15 Years; Monthly Statements: Maximum of 5 Years	Maximum of 3 Years
02052.0	Finance	Imputed Income	Human Resources Service Center; Office Responsible for Calculation	15 Years	Maximum of 3 Years
02026.0	Finance	Insurance Policies	Global Risk Management; Office Securing Policy	Liability Policies: Permanent; Non-Liability Policies: 6 Years	Maximum of 3 Years
02027.0	Finance	Intellectual Property - Royalties	Legal	Life of Licensing Agreement + 15 Years	Maximum of 3 Years
02028.0	Finance	Internal Audits	Department Performing Audit	7 Years	Until Next Audit
02056.0	Finance	Internal Control Documentation	Department	7 Years	N/A
02030.0	Finance	Investment Management	Treasury	Life of Ownership + 15 Years	Maximum of 3 Years
02031.0	Finance	Investment Performance	Trust Investments	15 Years	Maximum of 3 Years
02049.0	Finance	Manufacturing Costs	Office Responsible for Cost Determination	Maximum of 15 Years	Maximum of 3 Years
02119.0	Finance	Purchase Orders	Office Responsible for Purchase Order Issuance	15 Years	Maximum of 3 Years
02051.0	Finance	Regulatory Compliance - Financial Control Plans	Finance; Information Technology	Until Obsolete or Superseded + 15 Years	Maximum of 3 Years
02035.0	Finance	Regulatory Reporting - Financial Certifications	Legal	15 Years	Maximum of 3 Years
02115.0	Finance	Regulatory Reporting - SEC Filings	Corporate Secretary; Corporate Accounting; Financial Reporting	Published Versions: Permanent; Supporting Records: 15 Years	Maximum of 3 Years
02032.0	Finance	Risk Management Location Files	Global Risk Management	Until Outdated or Superseded	Maximum of 3 Years
02029.0	Finance	Standard Control Reports	Department	Annual, Semi-Annual & Quarterly Reports: 1 Year; Monthly Reports: 6 Months;	N/A

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				Daily & Weekly Reports: 3 Months	
02037.0	Finance	State Sales Tax Exemption Certificates	Tax; Controlling Office	Expiration + 15 Years	Maximum of 3 Years
02040.0	Finance	Tax Audit Files	Tax	15 Years After Settlement of Tax Audits	Maximum of 3 Years
02041.0	Finance	Tax Filings - Returns and Workpapers	Office Submitting Filing	Returns & Schedules, excluding Sales & Use and Excise Returns: Permanent; Other Records: 15 Years After Settlement of Tax Audits	Maximum of 3 Years
02042.0	Finance	Tax History Files	Tax	Permanent	Maximum of 3 Years
02043.0	Finance	Tax Identification Certification - W-9s	Finance Operations	15 Years	Maximum of 3 Years
02044.0	Finance	Tax Informational Reporting	Finance Operations; Human Resources Service Center	15 Years	Maximum of 3 Years
02033.0	Finance	Tax Location Files	Tax	Until Outdated or Superseded	Maximum of 3 Years
02045.0	Finance	Tax Matters Files	Tax	Until Outdated or Superseded	Maximum of 3 Years
02046.0	Finance	Unclaimed Property Reports	Financial Reporting	15 Years	Maximum of 3 Years
99999.0	Finance	ZTest Policy One - 02	Department Responsible for Accounts	10 Years	REV 02
03001.0	Human Resources	Affirmative Action Plans	EEO Compliance Office	Consolidated Plans and Reports: 4 Years; Local Records: Current Plan + 2 Prior Plans	Maximum of 3 Years
03004.0	Human Resources	Benefit Plans	Benefits Administration	Health and Welfare Plan Working Papers: Plan Obligations + 6 Years; All Other Records: Permanent	Maximum of Plan Obligations
03006.0	Human Resources	Benefit Plans Claims Administration	Benefits Administration	15 Years	Maximum of 3 Years
03008.0	Human Resources	Benefit Plans Management	Benefits Administration	Annual Reports and Trust Documents: Permanent; Other Records: 15 Years	Maximum of 3 Years
03027.0	Human Resources	Benefits - Participants Records	Human Resources Service Center	Service History: Until Financial Obligations Cease + 6 Years; Elections and Designations: 6 Years After Outdated; Other Records: 6 Years	Maximum of 3 Years
03012.0	Human Resources	Compensation Planning Records	Compensation; Human Resources Manager	15 Years	Maximum of 3 Years
03011.0	Human Resources	Compensation Plans	Compensation; Human	Life of Plan + 10 Years	Maximum of 3 Years

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			Resources		
03015.0	Human Resources	Disability and Medical Leave Records	Human Resources Service Center	6 Years After Close of Case	Until Close of Case
03016.0	Human Resources	Drug Tests	Human Resources Manager	Positive Results: 5 Years; Negative Results: 1 Year	N/A
03017.0	Human Resources	Employee Issues Files	Human Resources Manager; Supervisor	6 Years After Resolution	Maximum of 3 Years
03019.0	Human Resources	Employment Eligibility Verification Forms (I-9)	Human Resources Manager	Life of Employment + 3 Years	N/A
03020.0	Human Resources	Grievances	Human Resources Manager	LONGER of: Employment + 6 Years or 6 Years After Settlement or Per Labor Contract Requirements	Maximum of 3 Years
03023.0	Human Resources	Job Descriptions	Human Resources; Compensation; Department Issuing Job Description	6 Years	Until Outdated or Superseded
03024.0	Human Resources	Labor Relations Strategy Records	Employee Relations	Until Outdated or Superseded	Maximum of 3 Years
03025.0	Human Resources	Labor Union Negotiation Files	Human Resources Manager	Permanent	Maximum of Life of Contract
03026.0	Human Resources	Management Development Program Records	Staffing & Development	2 Years	Maximum of 2 Years
03029.0	Human Resources	Payroll Deduction Authorizations	Human Resources Service Center	Until Outdated or Superseded + 15 Years	Maximum of 3 Years
03030.0	Human Resources	Personnel Management	Human Resources Manager	Event, Achievement or Assessment Records: 5 Years;Hiring / Service History, Non-Vested: 6 Years after Termination;Hiring / Service History, Vested: 6 Years After Financial Obligations Cease; Non-Medical Leave Records: 6 Years After Close of Case	Non-Medical Leave Records: Until Close of Case; Other Records: Maximum of 1 Year After Termination or Transfer
03920.0	Human Resources	Personnel Management - Desk Files	Department	Maximum of 1 Year After Termination or Transfer	N/A
03050.0	Human Resources	Personnel Management - Recruitment	Hiring Manager	6 Years	Maximum of 3 Years
03033.0	Human Resources	Recruitment Program Records	Human Resources Manager	6 Years	Maximum of 3 Years
03034.0	Human Resources	Regulatory Reporting - EEOC	EEO Compliance Office	Consolidated Reports: 4 Years; Local Records: 2 Years	Maximum of 3 Years
03035.0	Human Resources	Relocation Records	Human Resources Operations	15 Years After Transfer, Relocation or Assignment Completion	Maximum of 3 Years

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03037.0	Human Resources	Tax Informational Reporting - Form 5500	Benefits Accounting	6 Years After Form 5500 Filing Date	Maximum of 3 Years
03038.0	Human Resources	Time Reporting Records	Human Resources Service Center; Entry Location	6 Years	Maximum of 3 Years
03938.0	Human Resources	Training Records - Non-Regulated	Office(s) Responsible for Development / Delivery and / or Attendance Tracking	Schedules & Attendance Records: Maximum of 2 Years; Training Materials: Until Obsolete or Superseded	Until Outdated or Superseded
03040.0	Human Resources	Training Records - Regulated	Office(s) Responsible for Development / Delivery and / or Attendance Tracking	Schedules & Attendance Records: 6 Years; Employees' Records: Employment + 6 Years; Training Materials: 6 Years After Outdated	Maximum of 3 Years
03045.0	Human Resources	Union Employee Notices	Location	Per Union Contract	Maximum of 3 Years
99998.0	Human Resources	ZTest Policy Two - 02	Human Resources Manager; Location	2 Years	REV 02
05001.0	Information Technology	Access Security Records	Information Technology; Office Controlling Access	Until Deleted or Outdated + 3 Years	N/A
05003.0	Information Technology	Backup Media – Disaster Recovery Data	Information Technology	Backup Rotation Schedule	N/A
05006.0	Information Technology	Business Continuation Plan	Information Technology; Global Risk Management; Location or Department	Until Outdated or Superseded	N/A
05004.0	Information Technology	Computer System Program Documentation	System Administrator	Until Data is Migrated or Purged & Documentation is No Longer Relevant to Existing Data	Maximum of 3 Years
05009.0	Information Technology	Hardware Documentation	Information Technology	While Applicable to Processing Online or Off-line Data	Until Outdated or Superseded
05011.0	Information Technology	Help Desk	Information Technology	Until No Longer Referenced	N/A
05010.0	Information Technology	Information Technology Standards	Information Technology	Until Outdated	Until Outdated
05008.0	Information Technology	Internet Registration Records	Information Technology	Life of Registration + 6 Years	Maximum of Registration Life
05012.0	Information Technology	Program / System Software	Information Technology	While Applicable to Processing Online or Off-line Data	Until Outdated
05905.0	Information Technology	Project Management - Information Systems	Project Manager	Maximum of 5 Years After Project Completion	Maximum of 3 Years

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05014.0	Information Technology	Software Management	Information Technology	Life of License + 6 Years	Maximum of License Life
05015.0	Information Technology	System Activity Monitoring Records	Information Technology; Office Monitoring Access	Maximum of 2 Years	N/A
05016.0	Information Technology	System Table Maintenance	Office Responsible for Table Maintenance	Accounting Systems' Chart of Accounts Tables: 15 Years; Other Systems: Maximum of 3 Years	Maximum of 3 Years
99996.1	Information Technology	ZTest Policy Four - 03	System Administrator	While Applicable to Processing On-Line or Off-line Data	REV 03
01039.0	Legal	Acquisitions and Sales - Real Property	Legal; IP Realty	Closing & Title Documents: Permanent; Other Ownership Records: Ownership + 10 Years; Abandoned Transactions: 2 Years After Abandonment	Maximum of 2 Years After Close
01001.0	Legal	Advice and Counsel	Legal	Maximum of 5 Years	Maximum of 3 Years
01058.0	Legal	Antitrust Oversight and Control	Legal	6 Years	Maximum of 3 Years
01005.0	Legal	Business and Product Development Legal Oversight	Legal	Maximum of 10 Years	Maximum of 3 Years
01009.0	Legal	Company Helpline Case Records	Ethics Office; Office Responsible for Investigation or Resolution	7 Years After Resolution	Maximum of Until Resolution
01017.0	Legal	Compliance Program Development and Maintenance	Office Responsible for Design, Implementation and / or Enforcement	Program Management: Life of Program + 2 Years; Compliance Process Certifications: Until Outdated or Superseded + 6 Years	Maximum of 3 Years
01055.0	Legal	Conflict of Interest Waivers	Legal	6 Years After Termination of Specific Representation	Maximum of 3 Years
01066.0	Legal	Contracts and Agreements	Office Controlling Contractual Relationship	Tax Agreements: Contract Obligations + 15 Years; All Others: Contract Obligations + 6 Years	Maximum of Life of Contract + 1 Year
01012.0	Legal	Contracts and Agreements - Improvements to Real Property	Office Managing the Property	Structural Improvements: Life of Property OR 20 Years after Project Completion; Non-Structural Improvements: 6 Years after Completion	Maximum of 3 Years After Improvement Completion
01067.0	Legal	Contracts and Agreements - Labor	Human Resources Manager	Permanent	Maximum of Life of Contract
01008.0	Legal	Corporate Policies Acknowledgements	Office Controlling Process	Until Outdated or Superseded + 6 Years	Maximum of 3 Years
01023.0	Legal	Foreign Trade Barrier Matters	Legal	Until Outdated + 3 Years	Maximum of 3 Years
01071.0	Legal	Fraud and Security Investigations	Office Conducting Investigation	5 Years After Investigation Close	Maximum of 3 Years

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01024.0	Legal	Insurance Claims - Liability	Legal; Global Risk Management	10 Years After Settlement	Maximum of Until Settlement
01068.0	Legal	Insurance Claims - Loss / Damage	Global Supply Chain	10 Years After Settlement	Until Settlement
01061.0	Legal	Intellectual Property - Abandoned Trademark Applications	Legal	Abandonment of Application + 6 Years	Maximum of 3 Years
01062.0	Legal	Intellectual Property - Common Law Trademarks	Legal	Date of Discontinued Use of the Trademark + 6 Years	Maximum of 3 Years
01027.0	Legal	Intellectual Property - Copyrights	Legal	Life of Copyright + 5 Years	Maximum of 3 Years
01063.0	Legal	Intellectual Property - Opinions	Legal	Life of Intellectual Property Matter + 6 Years	Maximum of 3 Years
01029.0	Legal	Intellectual Property - Patents	Legal	6 Years after Abandonment of a Patent Application, Lapse or Expiration of Last Foreign or U.S. Counterpart	Maximum of 3 Years
01030.0	Legal	Intellectual Property - Registered Trademarks	Legal	Life of Registration and / or Cancellation + 6 Years	Maximum of 3 Years
01064.0	Legal	Intellectual Property - Trademark Searches	Legal	Completion of Search + 6 Years	Maximum of 3 Years
01065.0	Legal	Intellectual Property - Unfiled Records of Inventions	Legal	System Disclosure Date + 10 Years	Maximum of 3 Years
01032.0	Legal	Legal Proceedings	Legal (Managing Attorney)	Litigation & Closed Claims: 10 Years After Resolution; Demand Letters and Claims Without Activity Since Incident Date: Maximum of 6 Years	Maximum of 3 Years After Settlement
01072.0	Legal	Legal Proceedings - Asbestos - testing 01	Legal (Managing Attorney)	Permanent	Maximum of 3 Years After Settlement
01033.0	Legal	Legal Proceedings - Attachments and Garnishments	Legal; Human Resources Service Center	Duration of Attachment + 10 Years	Maximum of Life of Attachment
01073.0	Legal	Legal Proceedings - Remediation	Legal (Managing Attorney)	Permanent	Maximum of 3 Years After Settlement
01070.0	Legal	Legal Proceedings - Service of Process	Legal	15 Years	Maximum of 3 Years
01059.0	Legal	Legal Proceedings - Third Party Subpoenas & Other Information Requests	Legal	Maximum of 3 Years	Maximum of 1 Year
01056.0	Legal	Licenses, Registrations and Certifications - FCC	Global Supply Chain	Duration of License	Until Renewal

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01038.0	Legal	Political Action Committee Filings	Government Relations	Until Filed + 3 Years	Maximum of 3 Years
01075.0	Legal	Product Liability Warranty Claims	Legal	Masonite Claims: Warranty Period or Maximum of 18 Years After Settlement; Other Claims: 10 Years After Settlement or Release	Masonite Claims: Maximum of 3 Years After Settlement; Other Claims: Maximum of Until Settlement
01040.0	Legal	Regulatory Audits, Inquiries and Exams	Legal	Non-Time Limited Regulatory Settlements, Obligations and / or Undertakings: Permanent; All Others: 10 Years After Completion	Maximum of 3 Years
01054.0	Legal	Regulatory Audits, Inquiries and Exams - Labor and Employment	Legal	3 Years After Completion	Maximum of 3 Years
01041.0	Legal	Regulatory Communications	Office Communicating with Regulator	Non-Time Limited Regulatory Settlements, Obligations and / or Undertakings: Permanent; All Others: 10 Years After Superseded	Maximum of 3 Years
01042.0	Legal	Regulatory Reporting	Office Responsible for Submission	10 Years	Maximum of 3 Years
01069.0	Legal	Releases and Settlements	Legal	75 Years	Maximum of 3 Years
01057.0	Legal	Right-of-Way Records	Global Supply Chain	Life of Easement / Agreement + 6 Years	Maximum of Life of Easement / Agreement
01074.0	Legal	Vehicle Titles	Vehicle Location	Duration of Ownership	Maximum of Ownership Period
08103.0	Operations	Aircraft Operations and Maintenance	Aviation	Until Disposition of Aircraft	Maximum of 3 Years
08104.0	Operations	Bids and Proposals	Global Supply Chain; Office Responsible for Bid Process	3 Years	Maximum of 3 Years
08125.0	Operations	Bills of Lading	Shipping Location	15 Years	Maximum of 3 Years
08130.0	Operations	Building and Grounds Maintenance	Location	Maximum of 3 Years	Maximum of 1 Year
08113.0	Operations	Business Planning	Office Preparing the Plan	Maximum of 10 Years	Maximum of 3 Years
08105.0	Operations	Certificates of Insurance - Contractors	Office Controlling Contractual Relationship	When Filed with Associated Contract: Related Contract Retention Period; When Filed By Contractor: Life of Relationship with Contractor + 20 Years	Until Superseded
08106.0	Operations	Contract and Lease Management	Global Supply Chain; Office Managing Lease	Maximum of Life of Contract / Lease + 3 Years	Maximum of Life of Contract

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08001.0	Operations	Crop Management	Location	Maximum of 10 Years After Harvest	Maximum of 3 Years
08107.0	Operations	Distribution Warehouse Management	Global Supply Chain	3 Years	Maximum of 3 Years
08108.0	Operations	Driver Logs	Vehicle Location	3 Years	Maximum of 6 Months
08109.0	Operations	Driver Qualification Records	Vehicle Location	Duration of Employment + 3 Years	Maximum of 3 Years
08110.0	Operations	Driver's Inspection Records	Vehicle Location	3 Months	Maximum of 3 Months
08128.0	Operations	Equipment Maintenance	Location	Maintenance, Inspection and Repair Records: Life of Equipment + 10 Years; Analysis Reports and Logs: Maximum of 3 Years	Maximum of Life of Equipment + 3 Years
08003.0	Operations	Facility and Equipment Construction and Drawings	Project Manager	Structural Improvements: LONGER of: Life of Structure / Facility OR 20 Years after Project Completion; Non-Structural Improvements: 15 Years After Completion; Equipment: Life of Equipment + 10 Years	Maximum of 3 Years After Project Completion
08005.0	Operations	Facility Plan	Location	Until Outdated + 6 Years	Until Outdated
08126.0	Operations	Import / Export Control	Shipping and / or Receiving Location	5 Years	Maximum of 3 Years
08114.0	Operations	Inventory Reconciliation	Office Managing Inventory	Maximum of 5 Years	Maximum of 3 Years
08006.0	Operations	Lot Samples	Location Conducting Test	Maximum of 1 Year	N/A
08115.0	Operations	Materials and Supplies Management	Office Managing Materials and / or Supplies	15 Years	Maximum of 3 Years
08008.0	Operations	Production and Productivity Data Management	Production Location	Maximum of 10 Years	Maximum of 3 Years
08127.0	Operations	Production Management	Production Location; Planner	Maximum of 3 Years	Maximum of 1 Year
08906.0	Operations	Project Management - Capital Projects	Project Manager	Approved: 15 Years After Project Completion; Non-Approved: Maximum of 7 Years After Final Decision	Maximum of 3 Years After Project Completion
08924.0	Operations	Project Management - Process Improvement Projects	Project Manager	Maximum of 5 Years After Project Completion	Maximum of 3 Years
08009.0	Operations	Quality Audits	Location Audited	7 Years	Maximum of 3 Years
08010.0	Operations	Quality Certification	Location	Life of Certification + 3 Years	Until Outdated

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08011.0	Operations	Quality Control	Location Conducting Test	Maximum of 10 Years or as Required to Support Warranty Claims	Maximum of 1 Year
08129.0	Operations	Railroad Records	Operating Location	5 Years	Maximum of 3 Years
08012.0	Operations	Right of Entry Permits and Licenses	Office Issuing Permit	Until Expiration + 1 Year	Until Expiration
08120.0	Operations	Transportation Carriers Management	Office Managing Relationship	Maximum of Life of Relationship + 3 Years	Maximum of 3 Years
08121.0	Operations	Transportation Planning & Coordination	Global Supply Chain	Maximum of 3 Years	Maximum of 1 Year
08123.0	Operations	Vehicle Records	Vehicle Location	Registrations: Expiration + 3 Years; Other Records: 3 Years	Maximum of 3 Years
99995.1	Operations	ZTest Policy Five - 02	Office Controlling Contractual Relationship	Contract Obligations + 6 Years	REV 02
04401.0	Sales & Marketing	Advertising	Marketing	3 Years After Last Use	Maximum of 3 Years
04403.0	Sales & Marketing	Competitive Intelligence	Marketing	Maximum of 10 Years	Maximum of 3 Years
04405.0	Sales & Marketing	Corporate Brand Management	Marketing	3 Years After Last Use	Maximum of 3 Years
04418.0	Sales & Marketing	Customer Account Management	Sales; Technology	Maximum of Life of Relationship + 1 Year	Maximum of Relationship Life
04404.0	Sales & Marketing	Customer Complaints	Office Resolving the Complaint	External Consumer Products Complaints: 4 Years After Resolution; All Other Complaints: 1 Year After Resolution; Complaint History Records: Maximum of 5 Years	Until Resolution
04407.0	Sales & Marketing	Market Research	Marketing	Until Outdated or Superseded + 3 Years	Maximum of 3 Years
04408.0	Sales & Marketing	Marketing Collateral	Marketing	3 Years After Last Use	Maximum of 3 Years
04411.0	Sales & Marketing	Pricing	Office Responsible for Setting Prices	5 Years	Maximum of 3 Years
04412.0	Sales & Marketing	Product Management	Marketing; Technology	Life of Product + 1 Year	Maximum of 3 Years
04413.0	Sales & Marketing	Prospect Management	Office Managing Leads	Until Outdated or Superseded	Maximum of 3 Years
04414.0	Sales & Marketing	Sales Account Management	Sales	Customers: Maximum of 6 Years After Last Use; Unsold Prospects: Maximum of 3 Years	Maximum of 3 Years
04415.0	Sales & Marketing	Sales Audits	Office Coordinating Audit	7 Years	Maximum of 3 Years

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04416.0	Sales & Marketing	Sales Data Management	Finance; Sales	Maximum of 10 Years	Maximum of 3 Years
04417.0	Sales & Marketing	Sales Orders	Sales	Orders: 15 Years; Other Records: Maximum of 2 Years	Maximum of 2 Years
04419.0	Sales & Marketing	Sales Promotions	Sales	Maximum of 3 Years	Maximum of 1 Year
07001.0	Technology	Conservation Management	Reporting Location	10 Years	Maximum of 3 Years
07003.0	Technology	Equipment Information	Location	Life of Equipment + 10 Years	Maximum of Life of Equipment
07005.0	Technology	Laboratory Notebooks	Technology	200 Years	Maximum of 3 Years
07007.0	Technology	Manufacturing Equipment and Process Standards	Technology	Maximum of Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
07006.0	Technology	Manufacturing Instructions	Technology	Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
07015.0	Technology	Manufacturing Materials Specifications	Technology	Maximum of Until Outdated or Superseded + 15 Years	Until Outdated or Superseded
07010.0	Technology	Project Management - Technology Projects	Technology Project Manager	Approved: 15 Years After Project Completion; Non-Approved: Maximum of 7 Years After Final Decision	Maximum of Project Completion / Decision + 2 Years
07009.0	Technology	Technical Research Data	Technology Project Manager or Lead Researcher	200 Years	Maximum of 3 Years
07014.0	Technology	Testing	Technology	Maximum of 10 Years	Maximum of 3 Years

RECORDS MANAGEMENT COMPLIANCE
3. Summary Report - Records Policies
All Retention Policies

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00962.0	Administrative	Administrative Support - Calendars and Day Planning	Department	No Longer Than 2 Years
00963.0	Administrative	Administrative Support - Contacts and Mailing Lists	Department	Until Superseded Or Outdated
00961.0	Administrative	Administrative Support - Correspondence	Department	No Longer Than 1 Year
00964.0	Administrative	Administrative Support - Travel Planning	Department	No Longer Than 1 Year
00950.0	Administrative	Buildings and Grounds Security	Location	Security Badges: Until Expired; Other Records: No Longer Than 3 Years
00934.0	Administrative	Internal Operational / Management Reporting	Office Preparing Report	Historical Trending Reports: No Longer Than 10 Years; Other Records: No Longer Than 5 Years
00919.0	Administrative	Meeting Management & Participation	Meeting Chair	No Longer Than 5 Years
00922.0	Administrative	Policies, Procedures, Guidelines and Processes	Office of Issuance	Compliance, Environment Health & Safety, and Human Resources Policies: After Superseded Or Outdated + 10 Years; Other Records: Until Superseded Or Outdated
00933.0	Administrative	Policies, Procedures, Guidelines and Processes - Records Management	Legal	Policies and Master Records Retention Schedule: After Superseded Or Outdated + 6 Years; Other Records: Until Superseded Or Outdated
00929.0	Administrative	Presentations and Speeches	Office Delivering the Presentation / Speech	No Longer Than 10 Years
00926.0	Administrative	Records Storage & Destruction	Office Responsible for Records	After Destroyed + 10 Years
00927.0	Administrative	Reference Materials	Department	Until Superseded Or No Longer Needed, and Review Regularly For Disposal

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00935.0	Administrative	Service Requests	Department Processing Request	No Longer Than 3 Years
00945.0	Administrative	Surveys	Office Conducting Survey	No Longer Than 3 Years
11162.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Agreements and Closing Documents	Corporate Secretary	Permanent
11161.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Due Diligence	Offices Involved In Due Diligence Process	Successful Transaction Unless Final Agreement Stipulates Retention: After Agreement Executed + 6 Years; Transaction Not Completed: Follow Terms Of Agreement Or No Longer Than 3 Years
11117.0	Corporate	Acquisitions, Mergers, Joint Ventures, Recapitalization and Divestitures - Transition Services	Offices Involved in Transitional Process	All Tax Audits Completed and Contract Obligations Cease
11003.0	Corporate	Board and Committees Minute Books and Records	Corporate Secretary (International Paper and US Subsidiaries); Responsible Party (Non-US Subsidiaries)	Permanent
11022.0	Corporate	Board of Directors and Officers - Selection and Retention	Corporate Secretary	Permanent
11102.0	Corporate	Charitable Contributions	Office Approving Contribution	Approved and Tax Deductible: All Tax Audits Completed; Denied and Non-Tax Deductible: No Longer Than 3 Years
11103.0	Corporate	Communications - External	Office Issuing the Communication	No Longer Than 7 Years
11104.0	Corporate	Communications - Internal	Office Issuing the Communication	No Longer Than 5 Years
11105.0	Corporate	Company Performance Reporting	Investor Relations	6 Years

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All Retention Policies

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11007.0	Corporate	Compensation - Board of Directors	Corporate Secretary	All Tax Audits Completed
11019.0	Corporate	Corporate Organization and Ownership	Corporate Secretary	Permanent
11021.0	Corporate	Delegation of Authority	Office Controlling the Delegation Authority	Until Superseded Or Obsolete
11106.0	Corporate	Event Management	Office Managing the Event	Board-Related Events: 10 Years; Other Events: No Longer Than 5 Years
11107.0	Corporate	Executive Biographies	Communications	Employee Termination + 10 Years
11108.0	Corporate	Foundation Management	Foundation	All Tax Audits Completed and Foundation Operations Cease
11109.0	Corporate	Image Management	Office Responsible for Controlling Image Access	Until Superseded Or Outdated
11110.0	Corporate	Industry Reporting	Office Submitting Report	5 Years
11111.0	Corporate	Legislative Tracking	Government Relations	No Longer Than 6 Years
11120.0	Corporate	Lobbying Activities	Government Relations	Until Superseded Or Outdated
11112.0	Corporate	Media Coverage	Communications	No Longer Than 5 Years
11113.0	Corporate	Political Action Committee Management	Government Relations	All Tax Audits Completed

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All Retention Policies

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<u>Record Series ID</u>	<u>Records Function</u>	<u>Records Series Name/Title</u>	<u>Office of Record</u>	<u>Official Version Retention Period</u>
	& Safety			
09351.0	Environment, Health & Safety	Environmental Permits - Issued	Location	Final Applications and Permits: Permanent; Supporting Documentation: After Permit Superseded Or Expired + 3 Years
09160.0	Environment, Health & Safety	Equipment Safety Inspection and Testing	Location	Most Current Until Superseded: 5 Years; Annual: 3 Years; Quarterly: 2 Years; Monthly: 1 Year; Weekly and Daily: 90 Days
09305.0	Environment, Health & Safety	Hazardous Materials (HAZMAT) Site Security Plans	Location	After Superseded Or Outdated + 5 Years
09055.0	Environment, Health & Safety	Hazardous Materials Removal Project Management	Location	Medical Surveillance and Exposure Records: Move To "Medical Records" After Project Completed; Other Records: After Project Completed + 30 Years
09260.0	Environment, Health & Safety	Incident Tracking	Corporate Environment, Health & Safety; Location	Recordable: 5 Years; Non-Recordable: 2 Years
09065.0	Environment, Health & Safety	Industrial Hygiene	Location	Noise Exposure Measurements: 2 Years; Other Records: 40 Years
09311.0	Environment, Health & Safety	Industrial Hygiene - Radiation Protection	Location	Protection Audits, Reviews, Surveys, Samplings, Calibrations, Forms 4 & 5, and Supporting Records: 3 Years; Other Records: After License Terminated + 3 Years
09110.0	Environment, Health & Safety	Injury and Illness Reporting	Location	6 Years
09090.0	Environment, Health & Safety	Licenses, Registrations, Accreditations and Certifications - Environment, Health & Safety	Location	After Expired + 3 Years
09045.0	Environment, Health & Safety	Material Safety Data Sheets (MSDS)	Location Using Hazardous Materials	After Superseded or Outdated + 30 Years
09080.0	Environment, Health & Safety	Medical Records	On-Site Registered Nurse (RN) or Designee	Employee or Contractor Termination + 40 Years

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RECORDS MANAGEMENT COMPLIANCE
3. Summary Report - Records Policies
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09120.0	Environment, Health & Safety	Pesticide Applications	Location	2 Years
09316.0	Environment, Health & Safety	Safety and Health Program Management	Corporate Health & Safety; Location	After Superseded Or Outdated + 3 Years
09100.0	Environment, Health & Safety	Safety Committee Meetings	Location	2 Years
09170.1	Environment, Health & Safety	Safety Permits and Procedures	Location	Permits: After Expired + 1 Year; Fit Tests: Until Next Testing; Other Records: Until Superseded Or Outdated
09326.0	Environment, Health & Safety	Solid Waste and Hazardous Materials Storage Facilities	Corporate Environment, Health & Safety; Location	Permits, Final Application, and Final Closure Records: Permanent; Testing and Inspections: 5 Years; Other Records: After Site Closed + 3 Years
09190.0	Environment, Health & Safety	Spills and Releases	Location	After Remediation Completed + 5 Years, Or As Mandated By Permit, Agreement, Or Order
09321.0	Environment, Health & Safety	Spills and Releases - Superfund Sites (Including State Equivalent)	Location	After Site Closed + 50 Years, Unless Specified By Order Or Decree
09200.0	Environment, Health & Safety	Storage Tanks	Location	Life of Tank + 10 Years
09210.0	Environment, Health & Safety	Toxic Substances Control	Location	5 Years
09250.0	Environment, Health & Safety	Waste Shipments	Location	Hazardous Waste: 5 Years; Other Shipments: 3 Years
09075.1	Environment, Health & Safety	Workers Compensation Claims Management	Claims Administrator	Releases / Settlement Papers: 75 Years; Denied Claims: After Decision Made + 3 Years; Other Records: After Settled and Last Payment Issued + 10 Years
02004.0	Finance	Accounting Policies & Interpretations	Corporate Accounting & Financial Reporting	All Tax Audits Completed and Policy Superseded Or Outdated

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All Retention Policies

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<u>Record Series ID</u>	<u>Records Function</u>	<u>Records Series Name/Title</u>	<u>Office of Record</u>	<u>Official Version Retention Period</u>
		Transactions	Reporting	Expired, Or Completed
02021.0	Finance	Financial Analyses and Reporting	Corporate Accounting & Financial Reporting; Planning & Analysis; Local Accounting Office	Goodwill Impairment Evaluations: All Tax Audits Completed; Other Records: 6 Years
02019.0	Finance	Financial Audits - External	Corporate Accounting & Financial Reporting; Office Audited	7 Years
02020.0	Finance	Financial Guarantees	Treasury	All Tax Audits Completed and Guarantee Expired
02029.0	Finance	Financial Internal Control Reporting	Department	Annual, Semi-Annual & Quarterly Reports: 1 Year; Monthly Reports: 6 Months; Daily & Weekly Reports: 3 Months
02010.1	Finance	Financial Planning and Forecasting	Controlling Office	5 Years
02022.0	Finance	Financial Statements	Corporate Accounting & Financial Reporting; Tax; Office Preparing Statement	Annual Statement: Permanent; Other Records: 7 Years
02024.0	Finance	Fixed Assets	Global Financial Services; Office Responsible for Asset Accounting	All Tax Audits Completed and Asset Depreciated & Disposed Of
02263.0	Finance	General Ledger	Office Responsible for Processing or Reconciling Transactions	Final General Ledger For Year: Permanent; Other Records: All Tax Audits Completed
02052.0	Finance	Imputed Income	Human Resources Service Center; Office Responsible for Calculation	All Tax Audits Completed
02026.0	Finance	Insurance Coverage	Global Risk Management; Office Securing Policy	Casualty and Liability Policies, Bonds, and Certificates (Including Environmental and Hazardous Materials Coverage): Permanent; Other Policies, Bonds, and Certificates: After Expired + 10 Years; Other Records: All Tax Audits Completed
02027.0	Finance	Intellectual Property - Royalties	Legal	All Tax Audits Completed and Agreement Expired

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02264.0	Finance	Intercompany Accounting	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed
02056.0	Finance	Internal Control Documentation	Department	7 Years
02030.0	Finance	Investment Performance - Money Market Management	Treasury	All Tax Audits Completed
02031.0	Finance	Investment Performance - Retirement Fund Reporting	Trust Investments	10 Years
02049.0	Finance	Manufacturing Costs	Office Responsible for Cost Determination	Standard Costs: All Tax Audits Completed; Other Records: No Longer Than 3 Years
02265.0	Finance	Payroll	Office Responsible for Processing or Reconciling Transactions	All Tax Audits Completed
02051.0	Finance	Regulatory Compliance - Financial Control Plans	Finance; Information Technology	After Superseded Or Outdated + 10 Years
02035.0	Finance	Regulatory Reporting - Financial Certifications	Legal; Financial Policy and Control	After Filed + 10 Years
02115.0	Finance	Regulatory Reporting - Securities & Exchange Commission (SEC) Filings	Corporate Secretary; Corporate Accounting & Financial Reporting	Filings: Permanent; Other Records: After Filed + 10 Years
02032.0	Finance	Risk Management - Locations	Global Risk Management	Until Superseded Or Outdated
02037.0	Finance	State Sales Tax Exemption Certificates	Location	All Tax Audits Completed and Certificate Expired
02009.0	Finance	Surety Bonds	Global Risk Management	Contract Obligations Cease + 6 Years

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02040.0	Finance	Tax Audit Files	Tax	All Tax Audits Settled + 10 Years
02290.0	Finance	Tax Basis Files	Tax	All Tax Audits Completed
02041.0	Finance	Tax Filings - Returns and Workpapers	Office Submitting Filing	Income Tax Returns: 75 Years; Other Records: After Tax Audit Settled + 10 Years
02042.0	Finance	Tax History Files	Tax	Permanent
02043.0	Finance	Tax Identification Certification - W-9s	Global Sourcing; Finance; Location	6 Years
02044.0	Finance	Tax Withholding Forms	Finance Operations; Human Resources Service Center	All Tax Audits Completed
02046.0	Finance	Unclaimed Property Reporting	Corporate Accounting & Financial Reporting	25 Years
03001.0	Human Resources	Affirmative Action Plans	Diversity & Compliance; Location	After Plan Issued + 3 Years
03418.0	Human Resources	Benefit Claims	Claims Administrators	After Claim Resolved + 7 Years and All Payouts Completed
03006.0	Human Resources	Benefit Claims Reporting	Global Compensation & Benefits	Claims Data: 10 Years; Reports: 5 Years
03417.0	Human Resources	Benefit Plans - Enrollments and Elections	Human Resources Service Centers; Location	After Superseded + 6 Years Or Plan Obligations Cease

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03008.1	Human Resources	Benefit Plans - Administration	Global Compensation & Benefits	Agreements and Amendments: Contract Obligations Cease + 6 Years; Other Records: 10 Years
03210.0	Human Resources	Benefit Plans - Governance and Reporting	Global Compensation & Benefits; Benefits Accounting; Legal	Workpapers: After Plan Finalized + 3 Years; Other Records: Permanent
03011.0	Human Resources	Compensation Plans - Administration	Global Compensation & Benefits	10 Years
03012.0	Human Resources	Compensation Plans - Awards	Global Compensation & Benefits; Human Resources Manager	All Tax Audits Completed and Final Payout + 7 Years
03015.0	Human Resources	Disability and Medical Leaves	Human Resources Service Center	After Decision Made Or Leave Completed, Whichever Is Longer + 3 Years
03016.0	Human Resources	Drug Testing	Human Resources Manager; Employee Service Center	Positive Employee Results: 10 Years; Positive Applicant Results: 3 Years; Negative Results: 1 Year
03017.0	Human Resources	Employee Issues	Human Resources Manager; Supervisor	After Resolved + 3 Years
03035.0	Human Resources	Employee Relocation	Human Resources Operations	All Tax Audits Completed + 7 Years
03019.1	Human Resources	Employment Eligibility Verifications	Human Resources Manager; Employee Service Center	Employee Termination + 3 Years
03020.0	Human Resources	Grievances	Location	Labor Union Grievances: After Settled + 10 Years; Other Grievances: After Settled + 6 Years
03402.0	Human Resources	Job Catalog	Compensation	After Superseded
03205.0	Human Resources	Labor Relations - Bids and Awards	Human Resource Manager; Location	Seniority Rosters: After Superseded + 2 Years; Other Records: After Position Awarded + 2 Years

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03024.0	Human Resources	Labor Relations - Collective Bargaining Campaigns	Employee Relations	Contract Obligations Cease + 5 Years
03025.0	Human Resources	Labor Relations - Collective Bargaining Negotiations	Employee Relations; Location	Contract Obligations Cease + 5 Years
03045.0	Human Resources	Labor Relations - Union Employee Notices	Location	Until Contract Obligations Cease Unless Retention Specified Per The Agreement
03920.0	Human Resources	Manager's Employee Desk File	Department	No Longer Than Termination Or Transfer + 1 Year
03030.0	Human Resources	Official Employee Record	Human Resources Manager	Employee Termination + 10 Years and Contract Obligations Cease
03029.1	Human Resources	Payroll Deductions	Human Resources Service Center; Location	Loans, Liens, and Garnishments: Final Payment + 7 Years; Other Records: After Authorization Superseded / Employee Termination + 4 Years
03220.0	Human Resources	Personnel Strategy Planning	Human Resources; Department	10 Years
03401.0	Human Resources	Position Descriptions	Human Resources; Compensation; Department Issuing Job Description	After Superseded / Position Abolished + 3 Years
03033.0	Human Resources	Recruitment Program	Human Resources Manager	6 Years
03414.0	Human Resources	Recruitment Program - Background Checks	Human Resources Manager	3 Years
03413.0	Human Resources	Recruitment Program - Hiring and Selection	Human Resources Manager	Records For Successful Candidates: Move To "Official Employee Record"; Records For Other Applicants: After Decision Made + 3 Years
03034.0	Human Resources	Regulatory Reporting - Equal Employment Opportunity Commission (EEOC)	Diversity & Compliance; Location	After Report Issued + 3 Years
03038.0	Human Resources	Time Reporting	Human Resources Service	6 Years

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			Center; Entry Location	
03026.0	Human Resources	Training - Management Development Program	Staffing & Development	After Superseded / No Longer Used + 3 Years
03938.0	Human Resources	Training - Non-Regulated	Office(s) Responsible for Development / Delivery and / or Attendance Tracking	Course Materials: After Superseded Or Outdated + 3 Years; Other Records: 2 Years
03040.0	Human Resources	Training - Regulated	Office(s) Responsible for Development / Delivery and / or Attendance Tracking	Certificates Of Completion: Employee Termination + 6 Years; Course Materials: After Superseded Or Outdated + 6 Years; Other Records: 6 Years
05100.0	Information Technology	Asset Management - Information Technology Equipment	Information Technology	After Equipment Disposed Of + 3 Years
05030.0	Information Technology	Computer System Application Documentation	Information Technology	Financial Applications Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Data Is Migrated Or Purged and Documentation Is No Longer Relevant To Existing Data, Or The Application Is Permanently Retired
05009.0	Information Technology	Hardware Documentation	Information Technology	Architecture, Configurations, and Documentation For Systems Supporting Tax Audits: All Tax Audits Completed; Other Records: After Hardware Disposed Of + 6 Years
05010.1	Information Technology	Information Technology Standards and Processes	Information Technology	Until Superseded Or Outdated
05008.0	Information Technology	Internet Domain Names and Addresses	Information Technology	After Registration Expired + 6 Years
05905.0	Information Technology	Project Management - Information Systems	Project Manager	Financial Programs Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Data Is Migrated Or Purged and Documentation Is No Longer Relevant To Existing Data, Or The Application Is Permanently Retired.
05014.0	Information Technology	Software Management and Licensing	Information Technology; Location	Financial Programs Holding Information Needed For Open Tax Audits: All Tax Audits Completed and License

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RECORDS MANAGEMENT COMPLIANCE
3. Summary Report - Records Policies
All Retention Policies

<u>Record Series ID</u>	<u>Records Function</u>	<u>Records Series Name/Title</u>	<u>Office of Record</u>	<u>Official Version Retention Period</u>
				Expired + 6 Years / Application No Longer Used; Other Records: License Expired + 6 Years / Application No Longer Used
05015.0	Information Technology	System Monitoring Activities	Information Technology; Office Monitoring Access	Until Superseded Or Outdated
05016.0	Information Technology	System Table Maintenance	Office Responsible for Table Maintenance	Master Data Supporting Tax Audits: All Tax Audits Completed; Other Records: Until Superseded Or Outdated
05001.0	Information Technology	System User Access	Information Technology; Office Controlling Access	Network User Id: 99 Years; Other Records: Until Deleted Or Outdated
01039.0	Legal	Acquisitions and Sales - Real Property	Legal; IP Realty	Closing & Title Documents: Permanent; Abandoned Acquisitions / Sales Transactions: No Longer Than 5 Years
01001.0	Legal	Advice and Counsel	Legal	No Longer Than 5 Years
01058.0	Legal	Antitrust Oversight and Control	Legal	6 Years
01005.0	Legal	Business and Product Development Legal Oversight	Legal	No Longer Than 5 Years
01017.0	Legal	Compliance Program Development and Maintenance	Office Responsible for Design, Implementation and / or Enforcement	Certifications: Until Superseded Or Outdated + 6 Years; Other Records: After Program Terminated + 2 Years
01055.0	Legal	Conflict of Interest Waivers	Legal	After Waiver Terminated + 6 Years
01066.0	Legal	Contracts and Agreements	Office Controlling Contractual Relationship	Environmental Or Hazardous Materials Remediation, Storage, Clean-Up, Or Other Services: Contract Obligations Cease + 50 Years; Other Records: Applicable Tax Audits Completed and Contract Obligations Cease
01067.0	Legal	Contracts and Agreements - Collective Bargaining	Human Resources Manager	Permanent

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All Retention Policies

<u>Record Series ID</u>	<u>Records Function</u>	<u>Records Series Name/Title</u>	<u>Office of Record</u>	<u>Official Version Retention Period</u>
01012.0	Legal	Contracts and Agreements - Improvements to Real Property	Office Managing the Property	All Tax Audits Completed and Assets Depreciated & Disposed Of
01023.0	Legal	Foreign Trade Barrier Matters	Legal	After Barrier / Requirement Removed + 3 Years
01200.0	Legal	Helpline Cases	Ethics Office; Office Responsible for Investigation or Resolution	After Resolved + 7 Years
01024.1	Legal	Insurance Claims	Legal; Global Risk Management	After Settled + 10 Years
01061.0	Legal	Intellectual Property - Abandoned Trademark Applications	Legal	Application Abandoned + 6 Years
01063.0	Legal	Intellectual Property - Clearance Searches and Opinions	Legal	Life Of Intellectual Property Rights + 6 Years
01062.0	Legal	Intellectual Property - Common Law Trademarks	Legal	Date Trademark Use Discontinued + 6 Years
01027.0	Legal	Intellectual Property - Copyrights	Legal	After Copyright Expired + 6 Years
01029.0	Legal	Intellectual Property - Patents	Legal	After Patent Application Abandoned, Or Last Foreign Or U.S. Counterpart Lapsed Or Expired + 6 Years
01030.0	Legal	Intellectual Property - Registered Trademarks	Legal	Life of Registration and / or Registration Cancelled + 6 Years
01064.0	Legal	Intellectual Property - Trademark Searches	Legal	After Search Completed + 6 Years
01065.0	Legal	Intellectual Property - Unfiled Records	Legal	200 Years

JULY 2011

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<u>Record Series ID</u>	<u>Records Function</u>	<u>Records Series Name/Title</u>	<u>Office of Record</u>	<u>Official Version Retention Period</u>
		of Inventions		
01032.0	Legal	Legal Proceedings	Legal (Managing Attorney)	After Resolved Or No Activity + 7 Years
01072.0	Legal	Legal Proceedings - Asbestos	Legal (Managing Attorney)	Permanent
01033.0	Legal	Legal Proceedings - Attachments and Garnishments	Legal	5 Years
01073.0	Legal	Legal Proceedings - Remediation	Legal (Managing Attorney)	Permanent
01070.0	Legal	Legal Proceedings - Service of Process	Legal	5 Years
01059.0	Legal	Legal Proceedings - Third Party Subpoenas & Other Information Requests	Legal	No Longer Than 3 Years
01056.0	Legal	Licenses, Registrations and Certifications – Federal Communications Commission (FCC)	Office Managing the License	Duration of License
01008.0	Legal	Policies Acknowledgements	Office Controlling Process	Until Superseded Or Outdated + 6 Years
01038.0	Legal	Political Action Committee Filings	Government Relations	3 Years
01075.0	Legal	Product Liability Warranty Claims	Legal	Masonite Claims: Warranty Period Or No Longer Than After Settled + 18 Years; Other Claims: After Settled or Released + 10 Years
01205.0	Legal	Regulatory Audits - External	Legal	No Longer Than After Completed + 10 Years

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01041.0	Legal	Regulatory Communications	Office Communicating with Regulator	Non-Time Limited Regulatory Settlements, Obligations and / or Undertakings: Permanent; Other Records: After Superseded + 10 Years
01042.0	Legal	Regulatory Reporting	Office Responsible for Submission	10 Years
01069.0	Legal	Releases and Settlements	Legal	75 Years
01057.0	Legal	Right of Ways and Easements	Global Supply Chain	After Revoked or Expired + 6 Years
01068.0	Legal	Transportation Claims - Loss / Damage	Global Supply Chain	All Tax Audits Completed
01074.0	Legal	Vehicle Titles	Vehicle Location	Until Vehicle Disposed Of Or Sold
08103.0	Operations	Aircraft Operations and Maintenance	Aviation	After Aircraft Disposed Of + 1 Year Or Transfer To New Owner
08104.0	Operations	Bids and Proposals	Global Supply Chain; Office Responsible for Bid Process	3 Years
08125.0	Operations	Bills of Lading	Shipping Location	3 Years
08130.0	Operations	Building and Grounds Maintenance	Location	No Longer Than 3 Years
08230.0	Operations	Business Continuity	Location or Department	Until Superseded
08113.0	Operations	Business Planning	Office Preparing the Plan	No Longer Than 5 Years

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08105.0	Operations	Certificates of Insurance - Contractors	Office Controlling Contractual Relationship	Life Of Relationship With Contractor + 20 Years
08106.0	Operations	Contract and Lease Management	Global Supply Chain; Office Managing Lease	Contract Obligations Cease + 6 Years
08001.0	Operations	Crop Management	Location	No Longer Than After Harvest + 10 Years
08107.0	Operations	Distribution Warehouse Management	Global Supply Chain	3 Years
08110.1	Operations	Driver and Vehicle Inspections	Vehicle Location	Roadside Inspections: 1 Year; Driver's Inspections: 3 Months
08108.0	Operations	Driver Logs	Vehicle Location	3 Years
08109.0	Operations	Driver Qualification Records	Vehicle Location	Employee Termination + 3 Years
08128.0	Operations	Equipment Maintenance	Location	Maintenance, Inspections, and Repair Records: Life Of Equipment + 10 Years; Analysis Reports and Logs: No Longer Than 3 Years
08003.0	Operations	Facility and Equipment Plans and Drawings	Project Manager	Facilities: After Sold, Ownership Transferred, Or Demolished + 6 Years; Equipment: After Disposition + 6 Years
08005.0	Operations	Facility Plan	Location	Until Outdated + 6 Years
08126.0	Operations	Import / Export Control	Shipping and / or Receiving Location	5 Years
08240.0	Operations	Internal Audits	Department Performing Audit	Financial Audits: 7 Years; Other Audits: Until

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<u>Record Series ID</u>	<u>Records Function</u>	<u>Records Series Name/Title</u>	<u>Office of Record</u>	<u>Official Version Retention Period</u>
				Superseded or Outdated
08114.0	Operations	Inventory Reconciliation	Office Managing Inventory	No Longer Than 3 Years
08006.0	Operations	Lot Samples	Location Conducting Test	No Longer Than 1 Year
08115.0	Operations	Materials and Supplies Management	Office Managing Materials and / or Supplies	4 Years
08250.0	Operations	Pilot Qualification Records	Aviation	Employee Termination + 3 Years
08220.0	Operations	Product Stewardship and Certification	Sustainability	Test Results, Assessments, Certifications, Attestations, and Approvals: After Superseded Or Outdated, + 6 Years; Other Records: 6 Years
08127.0	Operations	Production Management	Production Location; Planner	No Longer Than 3 Years
08906.0	Operations	Project Management - Capital Projects	Project Manager	Completed Projects: All Tax Audits Completed and Sold Or Disposed Of; Abandoned Projects: No Longer Than 5 Years
08924.0	Operations	Project Management - Process Improvement Projects	Project Manager	No Longer Than After Project Completed + 5 Years
08009.0	Operations	Quality Audits	Location Audited	7 Years
08010.0	Operations	Quality Certification	Location	Life of Certification + 3 Years
08011.0	Operations	Quality Control	Location Conducting Test	After Warranty Period Expired + 6 Years

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08129.0	Operations	Railroad Records	Operating Location	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08012.0	Operations	Right of Entry Permits and Licenses	Office Issuing Permit	After Expired + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08225.0	Operations	Sustainable Forestry Initiatives and Chain of Custody Management	Sustainability	5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08120.0	Operations	Transportation Carriers Management	Office Managing Relationship	No Longer Than Life Of Relationship + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08121.0	Operations	Transportation Planning & Coordination	Global Supply Chain	No Longer Than 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
08123.0	Operations	Vehicle Records	Vehicle Location	Registrations: After Expired + 3 Years; Other Records: 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04403.0	Sales & Marketing	Competitive Intelligence	Marketing	No Longer Than 5 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04405.0	Sales & Marketing	Corporate Brand Management	Marketing	After Last Use + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04505.0	Sales & Marketing	Customer Accounts Management	Sales; Technology	No Longer Than Life of Relationship + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04404.0	Sales & Marketing	Customer Complaints	Office Resolving the Complaint	External Consumer Products Complaints: After Resolved + 4 Years; Other Complaints: After Resolved + 1 Year	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04407.0	Sales & Marketing	Market Research	Marketing	Until Superseded Or Outdated + 3 Years	As Long As Needed For Business Purposes, But No Longer Than Official Version Retention Period
04500.0	Sales & Marketing	Marketing and Advertising	Marketing	After Last Use + 3 Years	As Long As Needed For Business Purposes, But No Longer Than

All Retention Policies

Wednesday, November 16, 2011 9:25 pm

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<u>Record Series ID</u>	<u>Records Function</u>	<u>Records Series Name/Title</u>	<u>Office of Record</u>	<u>Official Version Retention Period</u>
07014.0	Technology	Product and Process Testing	Technology	No Longer Than 10 Years
07010.0	Technology	Project Management - Technology Projects	Technology Project Manager	Approved: After Project Completed + 15 Years; Non-Approved: No Longer Than After Final Decision + 7 Years
07025.0	Technology	Research and Laboratory Notebooks	Technology	200 Years

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POLICY NUMBER:	205
SUBJECT:	Records Management
EFFECTIVE:	9/1/99
SUPERSEDES:	12/1/91

Purpose and Scope:

To ensure that all work locations of the Company actively manage the identification, retention and destruction of records developed and accumulated in the ordinary course of business. An active management program enables the Company to comply with relevant legal, tax or operation rules or requirements (including statutes of limitations) while at the same time minimizing future business risks and costs.

The policy covers all U.S. and European work locations of the Company including administrative, sales and technical offices plus manufacturing and distribution facilities. Business records pertain to both hard copy and electronic documents and records.

Policy:

Records are to be managed according to a documented and approved Records Retention schedule. A Records Management Coordinator should be designated for each facility or office. The Records Coordinator is responsible for receiving and submitting the Records Retention schedules for approval by the Records Retention Committee. Department managers are responsible for submitting their proposed draft schedules or modifications to the Facility Coordinator. The Manager, Records Management is responsible for the approval process (for U.S. locations).

In the event that a record is not listed on an approved schedule, the default Retention period should be applied.

Records Retention programs for European locations should be submitted to the Legal Department of the Brussels Coordination Center.

Practice:

Following are the major elements of the Company's records retention program:

Ownership of Records. All records received or created in the course of Company business are the corporate property of International Paper.

Retention of Records. International Paper decides how long to retain its records, where to retain them, and when to destroy them.

Default Retention Policy. International Paper records shall be destroyed as soon as possible, after no longer needed for business purposes. The default retention period is current year plus 2 prior years (C+2).

General Schedule. The Company's Records Retention Committee has approved a General Schedule, listing records found in many or all departments and facilities. These common records do not need to be included on facility or department schedules.

Draft Retention Schedules. The Manager of each department or facility shall prepare a Draft Retention Schedule. To aid in this effort, managers will be provided model retention schedules which may be or amended to suit their particular situations. The draft schedules will list the facility's

department's or group's records, with retention periods that reflect day-to-day operating needs.

Review of Draft Schedules. The Manager, Records Management, coordinates reviews of the drafts from archival, audit, legal and tax perspectives.

Approval of Schedules. The International Paper Records Retention Committee approves all schedules. Approved schedules are statements of International Paper policy and shall be implemented.

Implementation. Each facility, department or group manager is responsible for implementing the approved Records Retention Schedules covering records in their areas.

Coordination. The Manager, Records Management, provides coordination and assistance to facilitate the steps above.


Definition:

Records, as the term is used here, include paper documents, computer and electronic records, drawings, photographs, and any other documentation prepared or received in transaction of the Company's business.

Reference:

Records Management Videos and the Records Management Program Training Manual -- Available from Manager, Records Management.

Changes From Preceding Version of This Policy:



1. The number of the policy has been changed from 44 to 205 under the new notational system.

2. The policy was updated to include the European Records Management program and other wording changes.

Corporate Policy Guide

Title: Records Management

Number: 205

Effective: January 1, 2006

Supersedes: September 1, 1999

Once printed or duplicated this is not a controlled document. All controlled documents exist in electronic form on the Corporate Policy Guide web site.

1.0 Objective: To ensure that all work locations of the Company actively manage the identification, retention and destruction of records developed and accumulated in the ordinary course of business. An active management program enables the Company to comply with relevant legal, tax or operation rules or requirements (including statutes of limitations) while at the same time minimizing future business risks and costs.

2.0 Scope: The policy covers all U.S. and European work locations of the Company including administrative, sales and technical offices plus manufacturing and distribution facilities. Business records pertain to both hard copy and electronic documents and records.

3.0 Policy:

Records are to be managed according to a documented and approved Records Retention schedule. A Records Management Coordinator should be designated for each facility or office. The Records Coordinator is responsible for receiving and submitting the Records Retention schedules for approval by the Records Retention Committee. Department managers are responsible for submitting their proposed draft schedules or modifications to the Facility Coordinator. The Manager, Records Management is responsible for the approval process (for U.S. locations).

In the event that a record is not listed on an approved schedule, the default Retention period should be applied.

Records Retention programs for European locations should be submitted to the Legal Department of the Brussels Coordination Center.

4.0 Contact: Any questions or interpretations regarding this policy should be directed to the Senior Vice President, General Counsel and Secretary in Memphis, Tennessee.

5.0 Procedures: Please see attachment.

6.0 Other Company Guidance Documents: Records Management Videos and the Records Management Program Training Manual -- Available from Manager, Records Management.

7.0 Revision History:

DATE	MODIFICATION
January 1, 2006	<ul style="list-style-type: none">• Routine review• Reorganized into the following sections to conform to standard template: Objective, Scope, Policy, Contact, Procedures, Other Company Guidance Documents and Revision History
September 1, 1999	<ul style="list-style-type: none">• The number of the policy has been changed from 44 to 205 under the new notational system.• The policy was updated to include the European Records Management program and other wording changes.

Attachment to Records Management Policy, No. 205, Effective January 1, 2006

Procedures:

Following are the major elements of the Company's records retention program:

Ownership of Records. All records received or created in the course of Company business are the corporate property of International Paper.

Retention of Records. International Paper decides how long to retain its records, where to retain them, and when to destroy them.

Default Retention Policy. International Paper records shall be destroyed as soon as possible, after no longer needed for business purposes. The default retention period is current year plus 2 prior years (C+2).

General Schedule. The Company's Records Retention Committee has approved a General Schedule, listing records found in many or all departments and facilities. These common records do not need to be included on facility or department schedules.

Draft Retention Schedules. The Manager of each department or facility shall prepare a Draft Retention Schedule. To aid in this effort, managers will be provided model retention schedules which may be amended to suit their particular situations. The draft schedules will list the facility's department's or group's records, with retention periods that reflect day-to-day operating needs.

Review of Draft Schedules. The Manager, Records Management, coordinates reviews of the drafts from archival, audit, legal and tax perspectives.

Approval of Schedules. The International Paper Records Retention Committee approves all schedules. Approved schedules are statements of International Paper policy and shall be implemented.

Implementation. Each facility, department or group manager is responsible for implementing the approved Records Retention Schedules covering records in their areas.

Coordination. The Manager, Records Management, provides coordination and assistance to facilitate the steps above.

Definition:

Records, as the term is used here, include paper documents, computer and electronic records, drawings, photographs, and any other documentation prepared or received in transaction of the Company's business.



Corporate Policy Guide

Title: Global Records
Management

Number: 205

Effective: November 1, 2008

Supersedes: January 1, 2006

Once printed or duplicated this is not a controlled document. All controlled documents exist in electronic form on the Corporate Policy Guide web site.

1.0 Objective: The Records Management Policy (the "Policy") of International Paper (the "Company") was established to: (i) set consistent standards for the control and management of its business records from their creation or receipt through disposition; (ii) comply with applicable laws and regulations; (iii) safeguard records necessary to preserve the existence and status of the Company; and (iv) provide evidence of the Company's legal rights, privileges, assets, liabilities, and other obligations.

2.0 Scope: This Policy applies to all Company records, regardless of their physical medium, custodian, or location. Locations may include but are not limited to: all facilities and work locations of the Company, including mills, plants, converting centers, sales offices, distribution centers, research centers, and corporate headquarters offices (collectively the "Sites"); or any non-Company location where Company records are maintained, stored temporarily, or held for disposition, distribution, or preservation.

3.0 Policy: International Paper is committed to the systematic and efficient management of its business records from creation or receipt through disposition in accordance with applicable legal and regulatory requirements.

3.1 Definition of a Record

A record is defined as "recorded information, regardless of its medium or characteristics, that is created or received by the Company and intended to be retained for operational, legal, tax, audit, and/or historical purposes in connection with the transaction of Company business."

A record can be stored on: paper; electronic/digital media; magnetic media, microfilm and microfiche; or any other electronic or digital form. A record may also include: drawings; photographs; films; videos; or other representations prepared for or received in connection with the transaction of Company business. An electronic record is information that is recorded in a form that only a computer can process and that satisfies the definition of a record. Electronic records

include but are not limited to: electronic communications, e-mail, voice mail, and electronic documents; records that are part of an automated system such as a computer mainframe installation, personal computers, local area networks, wide area networks, or laptop computers; and Company records and information on personal digital assistants, cell phones, blackberries, pen drives, and other electronic devices.

3.2 Ownership

All records created or received and retained in the course of Company business are the property of the Company, and every Company employee is responsible for the proper and appropriate management of the Company's business assets. Failure to comply with the Company's Records Management Policy and Records Management Program could result in disciplinary action—up to and including termination.

3.3 Legal Holds

All records subject to a Legal Hold must be preserved as provided for in the Legal Hold notice. Legal Holds are directives that suspend the records retention policy, including destruction or other disposition of records that are related to a pending or threatened litigation, claim, administrative hearing, or governmental investigation—whether the records are in a hard copy, electronic/digital, microform, or other type medium. When the records are no longer subject to a hold order, Legal or Tax will send a notice indicating that records are released from Legal Hold and normal retention may resume on those records.

3.4 Implementation

The Records Management Group is responsible for overseeing compliance with this Policy, and this Policy will be implemented in accordance with the applicable laws and regulations of the countries in which the Company operates. Implementation may be achieved through a records management program that the Company may establish and modify from time to time as required by changes in the law or sound records management practices. This program may include but is not limited to: policies, procedures, and guidelines related to records retention and disposition, vital records protection, indexing and filing systems, and archives management.

This Policy, or any part thereof, may be amended or revised as deemed necessary by the Company from time-to-time, and the amendment or revision will be automatically incorporated into this Policy.

4.0 Contact: Any questions or interpretations regarding this Policy should be directed to the Records Management Group.

5.0 Procedures:

- United States Records Management Program – See the Records Management Web Site at <http://ipnet/legal/recordsmanagement/>
- Legal Hold Policy and Procedure - See the Records Management Web Site at <http://ipnet/legal/recordsmanagement/>
- Electronic Records Policy & Procedure - See the Records Management Web Site at <http://ipnet/legal/recordsmanagement/>
- European Records Management Program – See the European Records Retention Guidelines.

6.0 Other Company Guidance Documents:

- Acceptable Use Policy (USA), Corporate Policy 220(a) and Information Resources Policy (Non-USA), Corporate Policy 220(b) – accessible from the Corporate Policy Guide at <http://swnapps01.ipaper.com/Corporate%20Secretary/CPG.nsf/CPG%20By%20Number?OpenView>
- IT E-Mail Management Policy, ITMM001 – See the Information Technology Technical Services Web Site at <http://technicalservices.ipaper.com/>

7.0 Revision History:

Date	Modification
November 1, 2008	<ul style="list-style-type: none">▪ Policy updated to reflect changes in business process.
January 1, 2006	<ul style="list-style-type: none">▪ Routine review.▪ Policy reorganized into the following sections to conform to standard template: Objective, Scope, Policy, Contact, Procedures, Other Company Guidance Documents and Revision History.
September 1, 1999	<ul style="list-style-type: none">▪ Policy number changed from 44 to 205 under the new notational system.▪ Policy updated to include the European Records Management Program and other wording changes.
December 1, 1991	<ul style="list-style-type: none">▪ Policy implemented.

Attachment Entitled "IPC RIMP P&P Summary
re Discovery - 2011-12-05" Removed